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AkzoNobel
Tomorrow's Answers Today

October 15, 2012

ORIGINAL

SDMS DocID 2197028

Via Federal Express# 7940 8448 0388
Harry R. Steinmetz (3HS62)
US Environmental Protection Agency Region III
1650 Arch St.
Philadelphia, PA 19103-2029

Re: USEPA 104(e) Request for Information – Safety Light Corporation Superfund Site – Bloomsburg, Pennsylvania – Courtaulds North America

Dear Mr. Steinmetz,

Please accept this letter on behalf of Akzo Nobel Finance United States Holding LLC in response to the Section 104(e) request for information ("RFI"), which was issued by the United States Environmental Protection Agency ("EPA") and addressed to Courtaulds North America (CNA) c/o Akzo Nobel Chemicals Inc. Please note that Akzo Nobel Chemicals Inc. is not the appropriate entity to respond for CNA. Instead this response is being issued on behalf of Akzo Nobel Finance United States Holding LLC ("ANFUSHLLC") for the reasons described below. Subject to both the general and specific objections stated in the RFI and without waiving these or other available objections or privileges, ANFUSHLLC submits the enclosed response to the RFI.

By way of background, the Akzo Nobel group only owned the fibers business that was associated with the Mobile Alabama site, which was identified in the documents provided by EPA, for approximately one year. The Akzo Nobel group sold this business in December of 1999 and had only purchased the Courtaulds companies including the fibers business of Courtaulds in October 1998. It appears from a summary of historic corporate information that CNA went through several iterations and ultimately changed its name to Courtaulds Fibers Inc. ("CFI"). It was this entity that was acquired by the Akzo Nobel group. In October 1998 CFI changed its name to Acordis Cellulosic Fibers Inc. ("ACFI"). ACFI was sold to Acordis Acquisition IV, Inc. and Acordis Acquisition V, Inc. in December 1999. The legal entity ACFI remained with the Akzo Nobel group and changed its name to Fiberco Inc. in January 2000. Fiberco was subsequently dissolved and any liability that may have survived the dissolution belongs to the parent entity at the time of the dissolution. The parent entity at the time of dissolution was ANFUSHLLC.

In order to respond to the RFI, ANFUSHLLC has undertaken a diligent and good faith search for and review of documents and information in its possession, custody or control and investigated this matter by interviewing relevant personnel in order to identify any relevant information regarding this matter and the details regarding any potential dealings between CNA and the Safety Light Site.

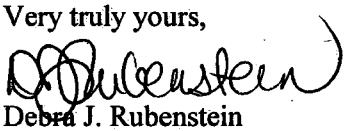
Despite this diligent search, ANFUSHLLC has been unable to locate any documents or information that provides any information that would indicate any dealings between CNA and the Safety Light Site. However, we provide a specific response to each question posed by EPA in order to demonstrate our interest in cooperating in this matter. In addition, we reiterate our

request that EPA to provide any additional documentation it has supporting the connection between CNA and the Site so that we can fully evaluate this matter.

ANFUSHLLC remains interested in cooperating with the EPA to determine how best to move forward with this matter and we look forward to working with the EPA in order to resolve this matter.

Should EPA have any questions regarding this response feel free to contact me at 914-333-7488.

Very truly yours,



Debra J. Rubenstein
Senior Regulatory Counsel
Akzo Nobel Inc.

CC: Humane Zia

Tel. *914-333-7488* ***Fax*** *914-366-4098* ***E-mail*** *debra.rubenstein@akzonobel.com*

AKZO NOBEL FINANCE UNITED STATES HOLDINGS LLC RESPONSE TO EPA's 104(e) REQUEST FOR INFORMATION (Safety Light Corporation Site)

Akzo Nobel Finance United States Holdings LLC ("ANFUSHLLC") hereby responds to the CERCLA 42 U.S.C. §9604, and the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927 Information Request sent to Courtaulds North America (CNA) and received on September 7, 2012.

The Akzo Nobel group only owned the fibers business that was associated with the Mobile Alabama site, which was identified in the documents provided by EPA, for approximately one year. The Akzo Nobel group sold this business in December of 1999 and had only purchased the Courtaulds companies including the fibers business of Courtaulds in October 1998. It appears from a summary of historic corporate information that CNA went through several iterations and ultimately changed its name to Courtaulds Fibers Inc. ("CFI"). It was this entity that was acquired by the Akzo Nobel group. In October 1998 CFI changed its name to Acordis Cellulosic Fibers Inc. ("ACFI"). ACFI was sold to Acordis Acquisition IV, Inc. and Acordis Acquisition V, Inc. in December 1999. The legal entity ACFI remained with the Akzo Nobel group and changed its name to Fiberco Inc. in January 2000. Fiberco was subsequently dissolved and any liability that may have survived the dissolution belongs to the parent entity at the time of the dissolution. The parent entity at the time of dissolution was ANFUSHLLC and therefore ANFUSHLLC is responding to this request for information.

As directed, ANFUSHLLC has provided a separate narrative response to each request and subpart of each question. ANFUSHLLC responds to the questions posed and the information requested subject to the following objections. ANFUSHLLC objects to the EPA's Information Request to the extent that the questions, either by themselves or in conjunction with the definitions or instructions contained therein, seek disclosure of information or documents that are protected by the attorney-client privilege or the attorney work-product doctrine. ANFUSHLLC further objects to the questions to the extent they are overly broad and/or seek information that is outside of the scope of the discovery process. Without waiving these objections, ANFUSHLLC will provide information that is responsive to CERCLA § 104(e)(2)(C).

Without waiving these objections and subject to these objections, ANFUSHLLC responds as follows:

INFORMATION REQUESTED

For the time period 1945 to the present, please answer the following questions in accordance with the Instructions set forth above.

1. **Describe in detail any and all business relationship(s) between CNA and Safety Light or its affiliates, as defined above and in the enclosed Definitions.**

   Response: ANFUSHLLC objects to the question on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, ANFUSHLLC provides the following response. As indicated above the Akzo Nobel group only owned the fibers business that was associated with the Mobile Alabama site, which was identified in the documents provided by EPA, for approximately one year between 1998 and 1999.

A Courtaulds publication describing the development of the LeMoyne plant of Courtaulds (Alabama) Inc.; two press releases describing the new facility; and an article in the local newspaper entitle "Starting a New Rayon Plant in Alabama" are provided for reference. The Courtaulds publication describes the operations at the Alabama facility as a viscose rayon staple fiber manufacturing facility. A copy of a 1995 Courtaulds publication describing the operations of Courtalds Fibers based in Axis, Alabama is also provided for your reference. We have not been able to locate any other records regarding the operations of this business. However, in the documentation provided there is no indication of any dealings with Safety Light or its affiliates or any operation that would have produced the materials that were allegedly sent to the Safety Light Site.

ANFUSHLLC has no information that would demonstrate any relationship with any of the companies listed above and CNA. ANFUSHLLC has no information that would be responsive to this request.

2. **Did CNA ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to the Site?**

Response: ANFUSHLLC objects to the question on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, ANFUSHLLC provides the following response. ANFUSHLLC has no information that would evidence any shipments of radioactive materials or items containing radionuclides from CNA to the Site other than the one document provided by EPA evidencing one shipment of a "sealed strontium 90 source, model LAB-369 (20 millicuries) at the end of November/beginning of December in 1966. ANFUSHLLC has no information that would be responsive to this request.

3. **Did CNA ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated?**

Response: ANFUSHLLC objects to the question on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, ANFUSHLLC provides the following response. ANFUSHLLC has no information that would evidence any shipments or arrangement for transportation or shipment of radioactive materials or items containing radionuclides from CNA to any of the companies identified above other than the one document provided by EPA and described above in response to Question Number 2. ANFUSHLLC has no information that would be responsive to this request.

4. **If you answered "yes" to Question 2 or Question 3, please respond to the**

following:

a. **Provide the time period during which each such transaction occurred.**

Response: ANFUSHLLC objects to the question on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, ANFUSHLLC provides the following response. ANFUSHLLC has no information that would evidence any transactions involving any shipments or arrangement for transportation or shipment of radioactive materials or items containing radionuclides from CNA to any of the companies identified above other than the one document provided by EPA and described above in response to Question Number 2. ANFUSHLLC has no information that would be responsive to this request.

b. **Provide the purpose or reason for each such transaction.**

Response: See response to question 4a.

c. **For each and every transaction, provide:**

i. **the entity to which you sent radioactive materials or items containing radionuclides (i.e., Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation and Shield Source Incorporated);**

Response: See response to question 4a.

ii. **a detailed description of each radioactive material or item or type of item(s) sent and the amount of radionuclides contained within each such material or item(s);**

Response: See response to question 4a.

iii. **the method used to send or transport such radioactive materials or items to the Site (e.g., hauler, U.S. mail, etc.);**

Response: See response to question 4a.

iii. **the date(s) of the pickup and delivery of radioactive material or item(s) containing radionuclides;**

Response: See response to question 4a.

iv. **all documents relating to the transaction, including but not**

limited to invoices, and correspondence regarding the type, amount, and transportation/disposal of the radioactive material or item(s) containing radionuclides to the Site;

Response: See response to question 4a.

v. **the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other persons or parties that have documentation or information pertaining to the transportation/disposal of radioactive material or item(s) containing radionuclides to the Site, and/or to the entities identified in Question 3.**

Response: See response to question 4a.

d. **If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of radioactive material or item(s) containing radionuclides, explain these arrangements and provide all documentation relating to those transactions. In addition, please identify:**

i. **the persons with whom you, or other such persons, made such arrangements;**

Response: Not applicable.

ii. **every date on which such arrangements took place;**

Response: Not applicable.

iii. **for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;**

Response: Not applicable.

iv. **the persons who selected the Site as the place at which materials were disposed or treated;**

Response: Not applicable.

v. **the names of employees, officers, owners, and agents for each transporter.**

Response: Not applicable.

e. **For each and every instance in which you/your company arranged for radioactive material to the Site, identify:**

i. **the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and**

Response: See response to question 4a.

ii. **any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, and/or ship materials to the Site.**

Response: See response to question 4a.

iii. **the names, titles, and areas of responsibility of any persons, including all CNA employees, present and former, who were involved in or would have knowledge of such arrangements.**

Response: See response to question 4a.

f. **Describe any permits or applications and any correspondence between CNA and any regulatory agencies regarding materials transported to or disposed of at the Site.**

Response: See response to question 4a.

g. **Provide copies of any correspondence between CNA and any third party regarding materials transported to or disposed of at the Site.**

Response: See response to question 4a.

h. **Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.**

Response: See response to question 4a.

i. **Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.**

Response: See response to question 4a.

5. **Did CNA ever generate other waste(s), not described in response to Questions 2 or 3, above, that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site? If yes, please provide a detailed description of such other waste(s) and any and all related documentation.**

Response: ANFUSHLLC objects to the question on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, ANFUSHLLC provides the following response. ANFUSHLLC has no information that would evidence any transactions involving any shipments or arrangement for transportation or shipment of radioactive materials or items containing radionuclides from CNA to any of the companies identified above other than the one document provided by EPA and described above in response to Question Number 2. ANFUSHLLC has no information that would be responsive to this request.

6. **For each question above, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.**

Response: The following individuals were consulted in the preparation of these responses:

Ben J. Schoordijk, Assistant General Counsel - Corporate / Advocaat
Legal, IP & Compliance
Akzo Nobel NV
Strawinskylaan 2555
PO Box 75730
1070 AS Amsterdam
The Netherlands

Louise Dinnage, UK Legacy Manager
Akzo Nobel UK Ltd
Legal, IP & Compliance
26th Floor, Portland House
London, UK SW1E 5BG

Julie Shannon, Assistant General Counsel Europe
Akzo Nobel UK Ltd
Legal, IP & Compliance
26th Floor, Portland House
London, UK SW1E 5BG

Donald Finlayson
Senior Tax Counsel
Tax Department
Akzo Nobel Services Inc.
525 West Van Buren - 16 FL

Chicago, IL 60607

7. **If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.**

Response: ANFUSHLLC has no information that would be responsive to this request.

8. **If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.**

Response: ANFUSHLLC has no information that would be responsive to this request.

9. **If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.**

Response: ANFUSHLLC objects to the question on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, ANFUSHLLC provides the following response. ANFUSHLLC has no information that would evidence any transactions involving any shipments or arrangement for transportation or shipment of radioactive materials or items containing radionuclides from CNA to any of the companies identified above other than the one document provided by EPA and described above in response to Question Number 2. ANFUSHLLC has no information that would be responsive to this request.

If pertinent records or documents were destroyed or are missing, provide us with the following:

a. **Your document retention policy;**

Response: Not applicable.

b. **A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;**

Response: Not applicable.

c. **A description of the type of information that would have been contained in the documents; and**

Response: Not applicable.

d. **The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.**

Response: Not applicable.

PROPOSED RELEASE FOR LOCAL PUBLICITY IN MOBILE AREA

1. Courtaulds, Inc., wholly owned subsidiary of Courtaulds, Limited, of London, announced today that a site near Mobile has been chosen for the construction of a plant to produce rayon staple by the viscose process. This plant will be operated by a subsidiary company of Courtaulds, Inc. to be known as Courtaulds (Alabama) Inc. to be organized in the State of Alabama.

2. Construction will start immediately on a 550 acre tract of land located on the Mobile River about 18 miles north of the City of Mobile.

3. The contract to engineer and build the new plant has been awarded to The H.K. Ferguson Company, industrial engineers and builders with headquarters in Cleveland, Ohio. Representatives of The Ferguson Company, which has operated extensively in Alabama and other southern states over a period of three decades, have already arrived to start construction operations. Construction of the plant has been authorized by the National Production Authority.

4. Construction is scheduled to be completed in early 1953 and an estimated 2,000 persons will be required at peak operations to build the plant. A force of 500 to 600 will be required to operate the plant, and Courtaulds executives have announced that the majority will be recruited locally.

5. Courtaulds, Limited, are the largest and pioneer producers of viscose rayon in the British Commonwealth. They operate plants in a number of locations in the British Isles, including the largest factory for the production of rayon staple in the world at Greenfield in North Wales. Subsidiary or associated companies of Courtaulds, Limited also operate plants in various European countries and Canada. A new factory is presently under construction by an associated company in Australia.

6. In 1910 Courtaulds, Limited, established the American Viscose Corporation, the largest and pioneer producer in the United States, which was operated as a subsidiary until early in World War II, when Courtaulds were forced to relinquish the preponderant part of their holdings in order to realize dollars for the British war effort.

7. The new plant with its initial output of 50,000,000 lbs. per annum will increase the production of viscose rayon staple in the United States by approximately 25 percent. A substantial proportion of this textile raw material is consumed in the southern states.

8. By this operation, Courtaulds, Inc., introduces the rayon industry to South Alabama.

9. Factors which were considered in the selection of the site were access to raw materials, availability of large quantities of water suitable for processing, a dependable source of electrical power, good transportation facilities, and a good labour supply. The principal manufacturing structure will consist of an integrated building that will house operations from the start of processing to the final packaging. Facilities will also be provided for warehousing of raw materials and for administrative purposes in conjunction with the actual plant operation.

10. In announcing their decision to locate the new plant in the Mobile area, Courtaulds, Inc. wish to express their appreciation of the friendly cooperation they have received from all local bodies in the Mobile area.

13th August, 1951.

From: Public Relations Dept. To:

1st August, 1963.

Courtaulds to make nylon 6 at Alabama

The following press notice was released by C.N.A. in New York this week.

"Courtaulds North America announced today its plans to produce nylon 6 at its Lemoyne, Alabama plant. It anticipates that supplies from the first section of the new 20 million lb. plant will be available in the latter half of next year. This development, which has been under study for some time, marks the entry of Courtaulds into the non-cellulosic fibre field in this country.

Courtaulds North America is also actively considering substantial additional production of both high modulus and regular rayon staple to meet the growing demand."

The following background on this may be useful to you. It represents the additional commont I shall be making in answer to Press enquiries.

1) Why are we doing this?

Because we foresee a growing market for nylon in the U.S.A. and want to be in on it.

2) Where are we getting the know-how from?

From our own resources. British Celanese had begun development just before the merger. Since then they have been developing production in a pilot plant. Because of Courtaulds arrangements with B.N S., all sales have been for conversion inside the Group e.g. by Furzebrook and others.

3) Do B.N S. know about this development?

Yes, both they and I.C.I. have been kept informed.

4) How does this affect the recent I.C.I./Celanese Corp. project to build a nylon 66 plant with B.N.S. know-how?

Output from Alabama will be in competition with it.

5) What is the growth prospect of the nylon market in the U.S.A.?

It is not only in the U.S.A. In the last two years there has been a re-appraisal of nylon costs generally due to improvements both at the polymer stage and in spinning techniques.

contd.....

Present U.S. production of nylon is about 500 mn. lbs. p.a. but demand is expected to grow, particularly for textured filament yarn in carpets, for bulk yarns in knitwear and (to a much greater extent than in the U.K.) for tyre yarns where nylon already holds 55% of the market.

6) Is the projected new capacity for rayon staple additional to the "less than 10% increase" recently reported in the press?

Yes, it is additional to that and substantially greater.

I have listed the above in question and answer form merely for convenience. The impression we want to give generally is that this is a logical development of our business in the States. There are no overtones of difficulty with I.C.I. or B.N.S. - though I suspect that some sections of the press will try to read them into it.

I hope this additional background will help you to keep your staff informed.

M.W. Pitts-Tucker.

MWPT/JMD

ARTICLE REPRINTED FROM

THE TIMES

Friday June 26 1959

NORTH AMERICAN JOURNEY—IX

STARTING A NEW RAYON PLANT IN ALABAMA

COURTAULDS ESTABLISHED ONCE AGAIN

From Our Special Correspondent

MOBILE, ALABAMA

Courtaulds are now in what must be a unique position for any British company operating abroad. Not only did they create the rayon industry in the United States at the beginning of the century, but in the past eight years they have built here in Mobile what is now the second largest rayon staple unit in the industry and their competitor—the largest unit—is the American Viscose Corporation, founded by Samuel Courtauld & Co. in 1910 and completely run and operated by them until it was sold outright in 1941 to help pay for the war. To have done all this on foreign soil is no small achievement; to have done it in the United States speaks for itself.

Having created their main competitor here, Courtaulds are fully aware of what they are up against; and after touring their large new plant just outside Mobile, your Correspondent can report that they are well equipped to look after themselves. The research laboratories alone are adequate testimony to that. The real tragedy is that this sort of situation should ever have arisen. Perhaps, as was strongly hinted to the British Government in March, 1941, some sort of gesture in the form of the sale of British assets in this country was needed to ensure Congressional agreement to the granting of large-scale American aid to Britain.

BITTER BLOW

But in the light of later negotiations, in which British securities and assets were pledged rather than sold outright, the sale by the Government of 95 per cent. of Courtaulds' holding in the American Viscose Corporation (equivalent to 91 per cent. of the corporation's total equity capital) for little more than $56m. (or £14m.) was a bitter blow to Courtaulds. The fact that the Government was subsequently directed by the Court of Arbitration to pay Courtaulds £27,125,000 hardly softened the blow, for Courtaulds valued the American Viscose Corporation's assets at $128m., even without including anything for goodwill. Yet, like all tragedies, it was perhaps inevitable in the circumstances, and by the end of the war even Mr. Samuel Courtauld was far from blaming the Government in principle for doing what it did at a critical stage of the war, though he still had some wry comments to make about their "bargain."

Several years after the war it was made even plainer what had been lost. In 1948 Courtaulds calculated that to restore to them the production and earning capacity of their American unit would cost them "very much more than double" the £27m. they received in 1941, and in 1953 Courtaulds received no less than $11m. for the remaining 5 per cent. of their holding in the American Viscose Corporation, compared with the $56m. received by the British Government for the other 95 per cent. only 12 years before.

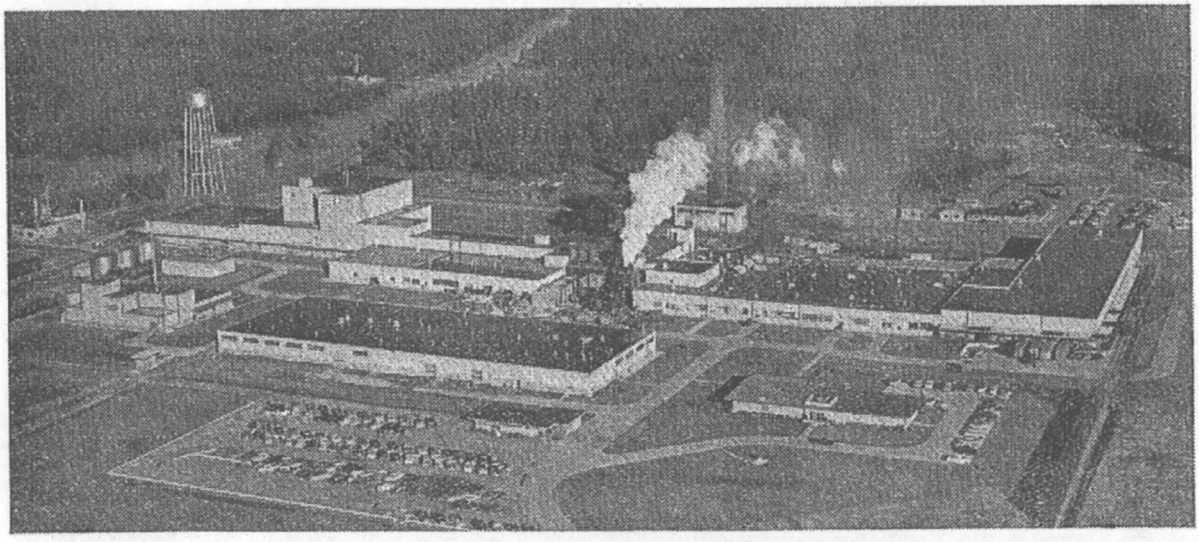
All this more than explains Courtaulds continuing ambition to return to the United States as soon as conditions permitted. By 1951 Courtaulds were ready to begin from scratch once again. As the chairman put it in July of that year, referring to the forced sale of their assets 10 years earlier: "From the time when we suffered this severe blow it has been the ambition of your Board, in the interests not only of Courtaulds Limited but also of the textile industry of our country as a whole, to re-establish the Company's active participation in rayon manufacture in the United States."

USEFUL PROFITS

A few weeks later on August 13 it was announced that Courtaulds Inc., the newly formed subsidiary in the United States, had decided to locate the new rayon staple plant near Mobile, and that the factory was planning to produce an annual output of 50 million lb. of rayon staple using the viscose process. Building started late that year in the midst of a typical southern pine forest, close to the Mobile river. By November of the following year the machinery was being operated for the first time and production started in earnest early in 1953. Little more than eighteen months later, Courtaulds Inc. approved plans to treble its capacity. This was carried out in two stages: the first increased it to 100 million lb. and the second carried it along to 150 million lb.

What the present capacity is it is difficult to say. Courtaulds are reluctant to give it and they are equally reticent about production, profits, and the amount of dollars actually invested here. In view of the somewhat peculiar circumstances in which they are operating and the strong competition they have had to face here, it is not hard to see why. But from what your Correspondent has seen of the plant and the people who run it, it must already be earning useful profits and be thoroughly established on a dividend-paying basis.

Now that Courtaulds' ambition to return in strength to the United States has been more than adequately fulfilled, no doubt they will soon feel free to reveal what the original dollar investment between 1951 and 1954 amounted to. Most companies would be glad to have achieved this once. To have done it twice in one generation is something to be proud of.



The North American mills of Courtaulds (Alabama) Inc.

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COURTAULDS
FIBERS

Courtaulds Fibers and the environment: the way ahead

Courtaulds Fibers Inc.
Axis,
Mobile County

Spring 1995

How we're becoming a better neighbor

Our workplace and our community

Environmental issues, especially industry's impact on the environment, have come under greater scrutiny in the past decade.

Protection of the environment has an important place in the list of society's priorities and industry has responded.

Industry has committed large sums of money to environmental improvement and has a greater openness and dialogue with neighbors and the community.

We at Courtaulds place great importance on caring for our employees, our neighbors and the countryside around us.

We have been making rayon at our riverside location here in Axis for more than 40 years. Implementing strategies to meet environmental challenges is an important part of our long tradition of bringing employment and prosperity to Axis and the Mobile area.

A major priority

The company, its scientists and engineers are committed to development programs that will result in major improvements in this field.

Our obligations are fully recognized. More money and resources than ever before — about 70 million dollars projected or already spent during this decade — support our determination to manage the impact of our operations on the environment.

The scale of work presently underway is exciting. By the end of 1996 the site's entire rayon spinning capacity — a major part of the production process – will be replaced by new technology costing more than 23 million dollars.

We target that this, along with investment in chemical recovery, will reduce our carbon disulfide emissions by two thirds over the six year period from the start of the Nineties.

Double benefit

Employee teams aggressively pursue recycling and waste reduction programs which benefit both environment and raw material costs.

The presence of well-trained emergency response teams ensures that if there is an incident of any kind it is dealt with quickly and effectively, minimizing any environmental impact.

Via mutual aid arrangements we are able to offer and receive help from other industries in an emergency.

Being a part of the community, we believe in the importance of working together to build a mutual awareness of what is involved in environmental care.

We value and are proud of our role in the LeMoyne Community Advisory Panel, a group comprising area industrial and residential neighbors. The panel has been able to discuss all kinds of issues in a mature, constructive way and has drawn praise from many sources, including the Environmental Protection Agency in Washington who have cited it as a model for others.

Our policy on the environment — there are details on the facing page — is an open one and this published review illustrates our informative and communal approach.

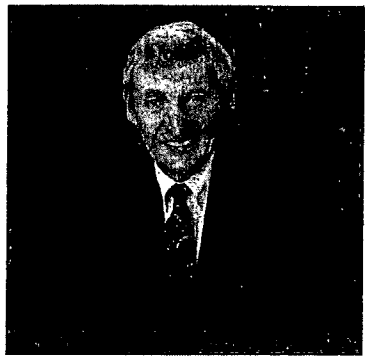
Expenditure on environmental care is an investment in the future to provide a successful business, not only for our employees, but the young people who will inherit their jobs in the years ahead.

Competitive ability

For this reason, we must ensure that the environmental solutions we select also improve our competitive ability and strengthen our long term position in the world marketplace.

Our commitment to the Axis site is plain. We are investing 230 million dollars to build the world's first TENCEL® fiber plant at this location — and TENCEL® is an environmentally benign process.

by
Dr. David Duthie
Chief Executive Officer,
Courtaulds Fibers Inc.



D. Duthie

Our aim is a bright and safe future through:

- ***developing our position as America's largest producer of rayon, providing the nation and overseas markets with important products***
- ***continuing to generate wealth locally through jobs and the spending power they bring***
- ***and by using the many local services and suppliers which help keep the heart of our economy beating.***

I hope you will find this first environmental review informative and interesting. If you have questions about the contents please write to me or the Director of Environmental Services, Courtaulds Fibers Inc., P.O. Box 141, Axis, AL 36505.

A clear policy that governs all activities

The company environmental policy relating to operations at the Axis site clearly sets out Courtaulds Fibers' commitment and a senior management team is responsible for ensuring it is carried out.

The company pledges to:

- ***Operate in a safe, environmentally responsible manner.***
- ***Improve the environmental soundness of processes.***
- ***Ensure resources are used effectively.***
- ***Minimize waste in all its forms.***
- ***Train and equip its employees to work in an environmentally responsible manner.***
- ***Regularly review standards and performance.***
- ***Work closely with those authorities regulating and monitoring the company's manufacturing operations.***
- ***Inform the local community and the media on environmental matters.***
- ***Encourage all employees to help the company achieve its environmental protection goals.***
- ***Ensure that its customers are informed of any environmental issue in using and disposing of its products.***

A full-time Director of Environmental Services has a dedicated day-to-day role involving all environmental activities. An Environmental Executive Committee constantly monitors, reviews and develops programs aimed at further improving our environmental performance.

A continuous web of TENCEL® flows from the Axis production line.

From natural beginnings, creating products for everyday life...

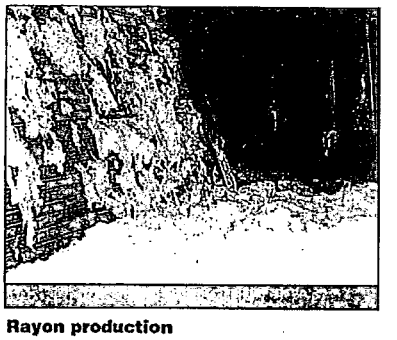
Cellulose woodpulp — a natural resource — is the main raw material used by the Axis plant. Cellulose is a component of all plant life and is acquired from renewable resources on plantations best described as "tree farms".

Natural woodlands and rain forests are not a source and the plantation land is generally unsuitable for food production.

Rayon is used by manufacturers in a wide range of textiles from fashion clothing to drapery and upholstery and in an extensive range of medical and hygiene end uses.

Sodium sulphate, a by-product of the rayon process, is supplied to manufacturers of detergents, textiles, glass and carpet fresheners.

Another by-product, sodium hydrosulfide, is sold to pulp and paper mills for use in the woodpulping process.



Rayon production

New way to cut air emissions

TENCEL® — an exciting new fiber

TENCEL®, produced in a separate, purpose-built factory, is an exciting new man-made fiber, the first for well over 20 years.

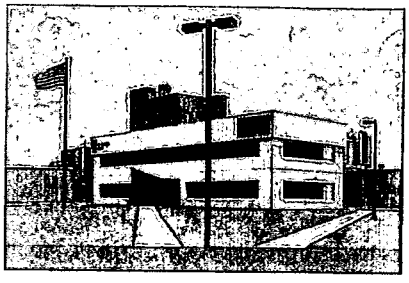
Although made from cellulose, it is very different from rayon and has been described by fashion commentators as the new wonder material, offering great strength but with the natural appearance and feel of silk or cotton.

It is in demand for luxury garments, but is also being developed for non-woven and industrial markets. It is a product of great potential.

The second phase of the TENCEL® plant, now being built at the Axis site and due to come on stream in the summer of next year, will boost production by 24,000 tons to over 43,000 tons annually.

The TENCEL® production process is environmentally benign.

Products made from rayon and TENCEL® are biodegradable.



Courtaulds targets:

- *reducing carbon disulfide emissions by a quarter by the end of 1995 and two thirds by the end of 1996*
- *a $25 million capital spending plan*
- *continuing research to develop ways to reduce emissions beyond the 1997 level*

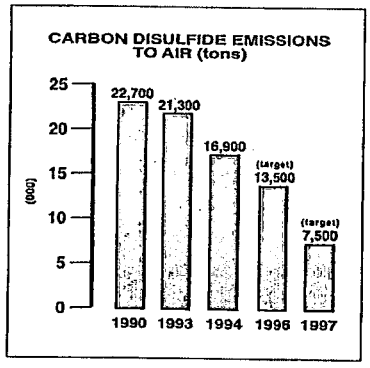
The challenge is to find a cost effective solution to emissions reduction enabling the Mobile plant to remain competitive in the face of low-cost competition and rising imports of fiber, yarn and fabrics.

The smart technology developed here in Mobile is a compact, totally enclosed rayon spinning and wash machine that enables cost effective recovery of carbon disulfide.

The technology has benefits to the company, its employees and customers, namely:

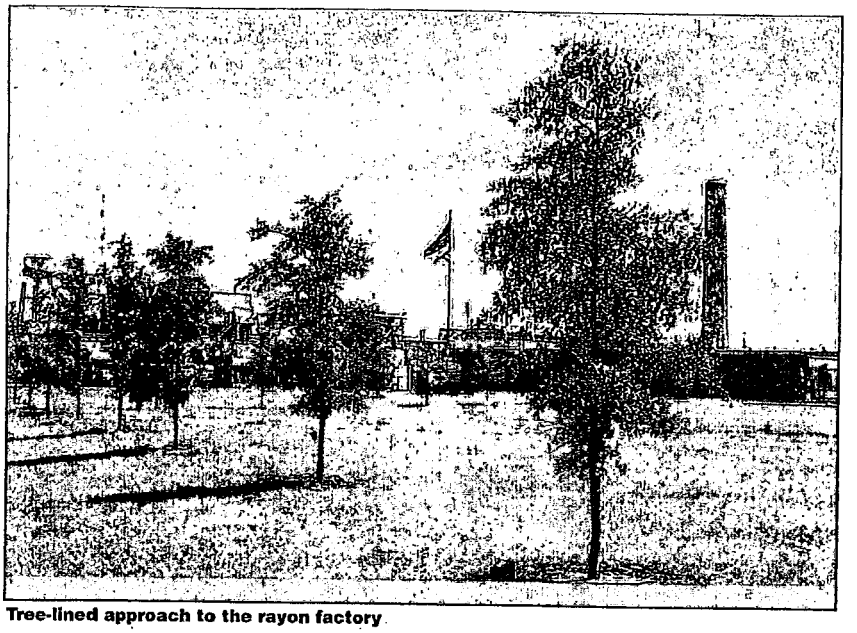
- *better working environment*
- *better operating continuity*
- *more consistent product quality*
- *cost reductions*

The conversion of all production to the new technology will take place over three years from 1994 to the end of 1996 with the first new machine already in operation.



New computer-controlled systems have been installed to reduce air emissions.

How solid waste is shedding weight



Tree-lined approach to the rayon factory

Well-screened from passers-by on Highway 43, within the boundaries of the Fibers location, are landfill facilities set aside for the disposal of non-hazardous waste.

Significant reductions in the volumes going to landfills are being made and targets for the future will cut quantities still further.

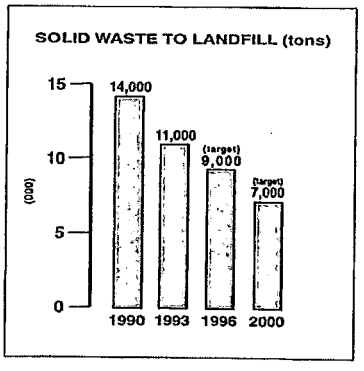
The principal material, an inert by-product from our wastewater treatment process, is targeted for a 50% reduction in volume following process changes.

Deepening of new landfill cells and filling to higher levels will make better use of permitted areas. The landfill is provided with a clay liner and leachate collection to prevent any run-off and when full is capped and landscaped.

In three years since 1990 our paper recycling has grown from zero to 325 tons per year; almost a ton per day.

In the last two years recycling of wire strapping from our raw materials has grown from zero to 180 tons per year.

In total, about 1000 tons per year of paper, wire and other materials are recovered by recycling. A continuous improvement team plans to do even better.



Energy: making less power go further

The plant generates its own steam for the manufacturing process.

Nine boilers are fueled by locally sourced clean burning natural gas.

The three oldest boilers will be replaced in 1995 by new ones fitted with the latest technology, reducing nitrogen oxides to well below regulatory requirements.

To minimize potential emissions of sulphur oxides, very low sulphur diesel oil has been chosen as the standby fuel, despite its higher cost.

Liquids: meeting the challenge to reduce the flow

The rayon process requires a large quantity of water which is drawn from 13 on-site wells. Water is recycled and reused, often two or three times, and ways of reducing consumption are constantly being explored.

Neutralized

After use in the process, water is channeled through the company's own wastewater treatment facility where it is neutralized and treated for the removal of wastes before being dispersed via a pipe into the Mobile River.

The discharge is strictly controlled via the permitting process of the Alabama Department of Environmental Management.

Each year more than four million dollars is spent on wastewater treatment. The impact of our wastewater on the river is assessed annually in a detailed study for the Alabama Department of Environmental Management, the Discharge Information Zone (DIZ) Study. This confirms there is no adverse impact on flora or fauna in the river.

Upgrading processes

Since the start of the Nineties, well over six million dollars in capital and operational expenditures have led to improved recovery systems for zinc, which is recycled rather than wasted. Zinc in effluent has been cut by more than half.

As part of our pollution prevention plan, additional protection of chemical storage tanks to guard against spillages is proceeding, funded by investment of half a million dollars.

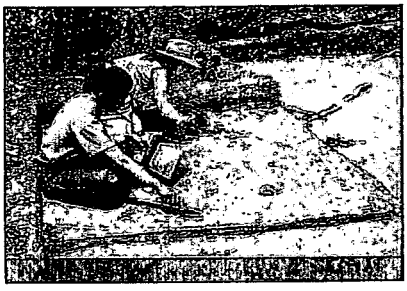
No additional water will be required for the major expansion of our TENCEL® facility next summer. This very positive news results from successful water conservation programs.

Courtaulds Fibers is proud to be helping safeguard, within its grounds, one of the most important historical sites in Alabama — the remains of the original town of Mobile — Fort Louis De La Louisiane, founded in 1702.

At regular periods throughout each year, Courtaulds welcomes archaeologists and volunteers with the Old Mobile Project as they excavate and research parcels of land among the pine trees in a quest to discover more details of our country's colonial past.

Diggings are taking place at several sites within the LeMoyne Industrial Park and some of the most interesting finds from the early 18th-Century settlement have been made within the boundaries of Courtaulds' 660 acre location.

Courtaulds provides maintenance and security for a historic monument erected on its property by the people of Mobile in 1902, which marks the old French colony overlooking the Mobile river.



(TOP) A monument marks the site of the old French colony.

(ABOVE) Excavations have revealed many interesting historical articles from the colonial past.

Students and staff from the University of South Alabama archaeological department receive support from the company and their progress is followed with great interest by Courtaulds' employees and the local community.

Creating interest

In fact, it was largely due to the enthusiasm of a Courtaulds Fibers employee, James 'Buddy' Parnell, who encouraged support from other local residents, that some of the historical remains were first located in 1989.

Since then hundreds of artifacts have been uncovered and the remains of 53 buildings located.

The company, which plans to preserve and protect the site and provide access for professional research, is delighted to be working together with the community uncovering secrets of the first capital of French Louisiana and helping preserve them for future generations.

Preservation

Of equal importance is the commitment to preserve and maintain the natural habitat and wildlife that flourishes throughout the Courtaulds site and in the river that borders it.

Trees and plants of many varieties thrive alongside the workings of industry and visitors to the factory and "the diggings" may well spot heron, wild turkeys, possums, deer and raccoons. Armadillos and alligators around the river bank are more difficult to observe, but they and many other types of wildlife make up the site 'population'.

Why Courtaulds Fibers is part of the fabric of Mobile

(TOP) A row of anniversary trees frame the factory buildings.

(ABOVE) Individual plaques identify trees planted in honor of employees.

Anniversary trees

In recent years, alongside site roads, a new generation of oak and flowering pear trees has appeared.

Each tree marks the achievement of 25 years of company service by an individual employee and plaques displaying their names are set in the soil nearby — a fitting gesture recognizing the contribution and loyalty of our people.

Courtaulds Fibers has a distinguished record of long-serving employees, with several individual careers stretching over 40 years. There is a tradition of one family member following another to a Courtaulds career and numerous families are represented by two or more members employed by Courtaulds.

Recently, personnel records confirmed a total of 289 years service spanning two generations by one particular family.

Being part of the community since 1952, it is not surprising that Courtaulds Fibers and its people play a significant part in local life — a contribution enjoyed down the years both at the corporate level and by individual employees.

The company has always supported the community. We are major sponsors of United Way, the Alabama School of Mathematics and Science and the planned Estuarium at Dauphin Island. We are partners in education with Satsuma High School and support some 35 other activities, including the arts, sports and historical associations.

But Courtaulds Fibers' major impact is one which is not often realized — our total economic impact on Mobile county is about 180 million dollars each year.

The company is an enthusiastic supporter of the LeMoyne Community Advisory Panel where it is joined by representatives from the six other plants in the area and community leaders to review and debate concerns about industrial operations.

Excellent example

Open and frank exchanges are a feature of the monthly meetings and the forum has been cited as an excellent example of industry and neighbors working together.

A regular LeMoyne newsletter, *The Inscriber*, is distributed throughout the neighborhood, reporting on environmental and other developments.

Courtaulds has produced a company fact sheet which is freely available to the community and also handed out to the many visitors to the plant.

These include students from local universities, schools and colleges, some of whom take part-time jobs with Courtaulds to gain engineering or other work experience.

Flow of information

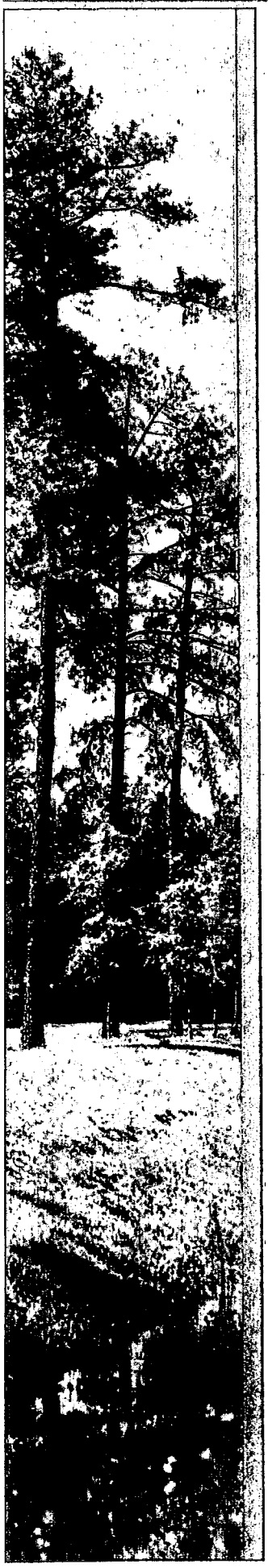
As part of a two-way flow, experts from Courtaulds visit institutions and associations to give advice on careers, to talk generally about manufacturing activities and explain industry's contribution to the local economy, the state, and Courtaulds' position as a material supplier to major customers across the nation.

And there are other ways to be involved, too.

Links have been forged with youth baseball, softball and football teams, and support given to arts societies. Funds and equipment supplied to schools and centers for the needy allow learning programs to advance more readily.

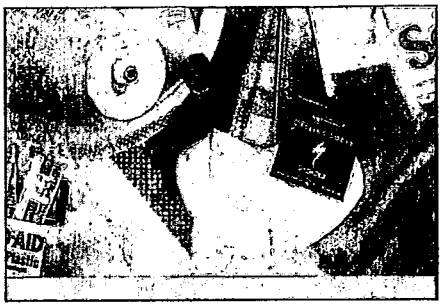
Courtaulds Fibers looks forward to maintaining and further developing its participation and support of community affairs in the months and years ahead.

Trained to respond: a Courtaulds emergency crew check the equipment on their vehicle.

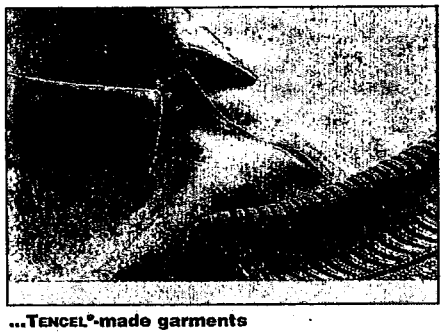


The products we make,
make these everyday items —

COURTAULDS FIBERS



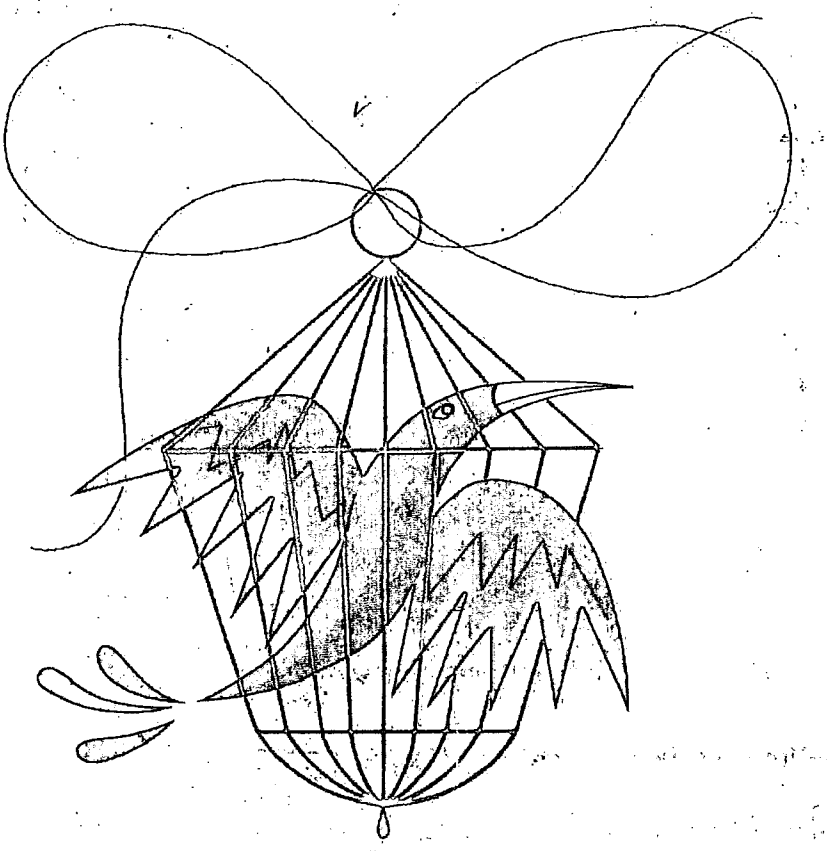
Products made from rayon...



...TENCEL®-made garments

CRAFTED WITH PRIDE IN U.S.A.

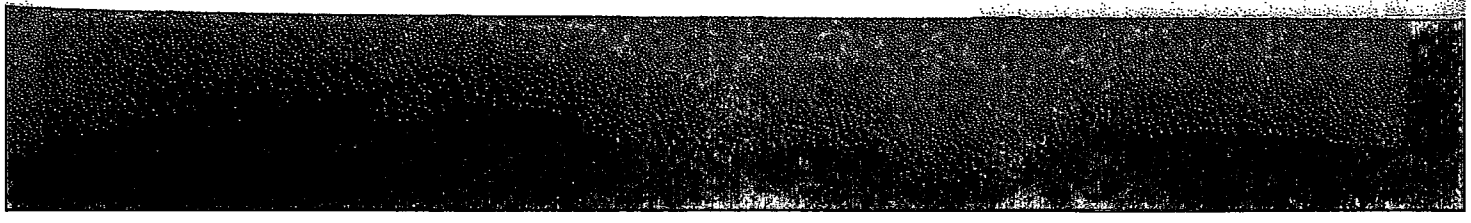
Courtaulds Fibers Inc.
P.O. Box 141
Axis,
Alabama 36505
Tel: 334 679 2200
Fax: 334 679 2452



COURTAULDS (ALABAMA), INC.

FOREWORD

THIS is the story of the building of the LeMoyne plant of Courtaulds (Alabama) Inc. and of the people who put together the steel and concrete, who operate the machines and keep them in repair, exercise the technical controls and give leadership to the entire operation. This is a joint undertaking by all kinds of men and women, who use their skills and knowledge to manufacture a fine product. It is in praise of such people — the employees of this plant— that this booklet is designed and dedicated.

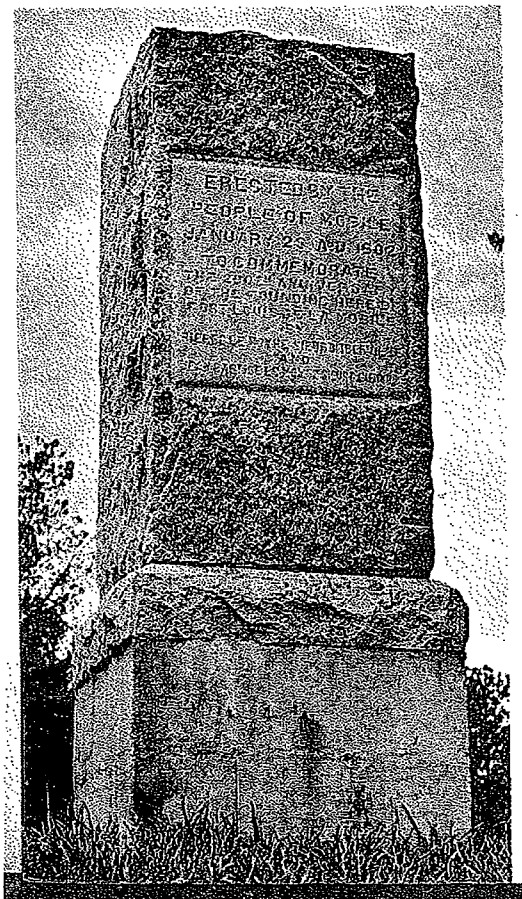


PHOENIX PROJECT

THE Courtaulds (Alabama) story had its beginning in the minds of the Directors of Courtaulds, Limited, who had for several years looked forward to re-establishing the Courtaulds name in the rayon industry of the United States. Years before, the Board had decided to introduce rayon to the United States, and for thirty years had watched its growth and development from a modest beginning in a small town in Pennsylvania into the largest single rayon-producing company in the world.

The economics of war caused Courtaulds to withdraw from the American market. This great disappointment was replaced by determination on the part of the Directors to reestablish themselves in the industry which they had helped to create. When in 1950 it was decided to build a new plant in America, the work was undertaken with vigor and ingenuity to create the most modern operation the industry had yet known.

Scores of prospective plant sites were inspected before the final selection was made. In Mobile County, Alabama, a large tract of land was available on the banks of the Mobile River at Twenty-Seven Mile Bluff, where two hundred and fifty years before the LeMoyne brothers, with their small band of French colonists, had founded the first settlement of Mobile. This tract, located on highway, railroad and river, with an abundant supply of fresh water and



Monument commemorating the first settlement of Mobile at Twenty-Seven Mile Bluff.

conveniently near the suppliers of raw materials, was purchased by the Company, and in July of 1951 ground was broken by the contractor and construction was begun in the midst of a pine forest.

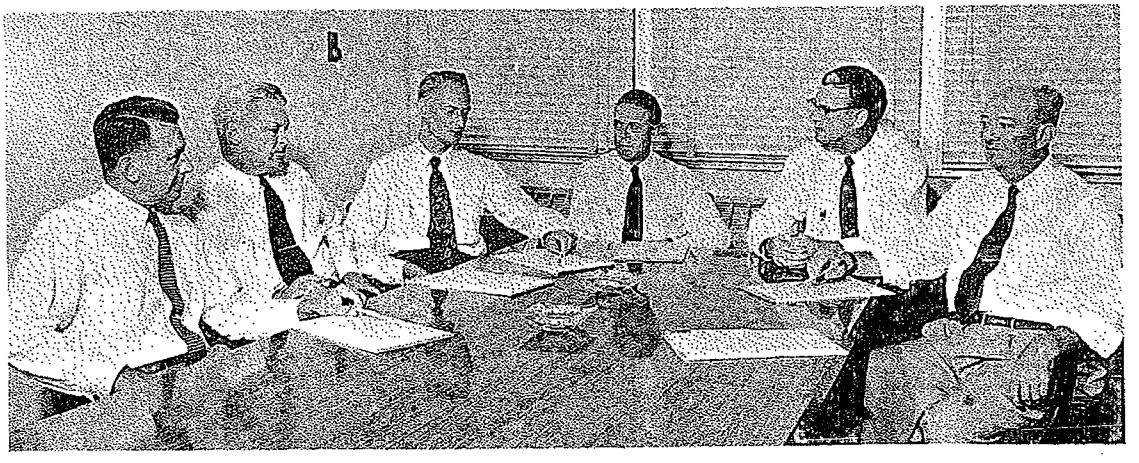
British technical knowledge and American engineering ingenuity were adequately demonstrated, and within fifteen months the multi-million dollar plant was producing its first viscose rayon staple fiber. Today the plant is operating at top capacity, making a quality product which is well received by the American market.

It is quite fitting that someone with a poetic mind should have chosen as the identifying name for the construction project — "Phoenix" —which legendary bird out of its own cold ashes rose again with even more brilliant plumage to attain greater heights than ever before.

Charles L. Paine, President, Courtaulds (Alabama), Inc.

LeMoyne Plant of Courtaulds (Alabama), Inc.

Management Conference.



THE STORY OF VISCOSE

Richard S. Thomas, Vice President and Plant Manager of Courtaulds (Alabama), Inc.

Viscose rayon staple fiber is a quality product—made from the finest materials available, with the most up-to-date machinery, operated by well-trained and conscientious employees. Nature provides us with our principal raw material — cellulose — which is found in all forms of plant life. For our use it is obtained from the paper industry in the form of snow-white sheets of highly purified wood pulp. The bales of sheeted pulp are unloaded from freight cars and carefully stacked in the reception area. After a sample has been tested, the sheets of pulp are fed automatically into the production line.

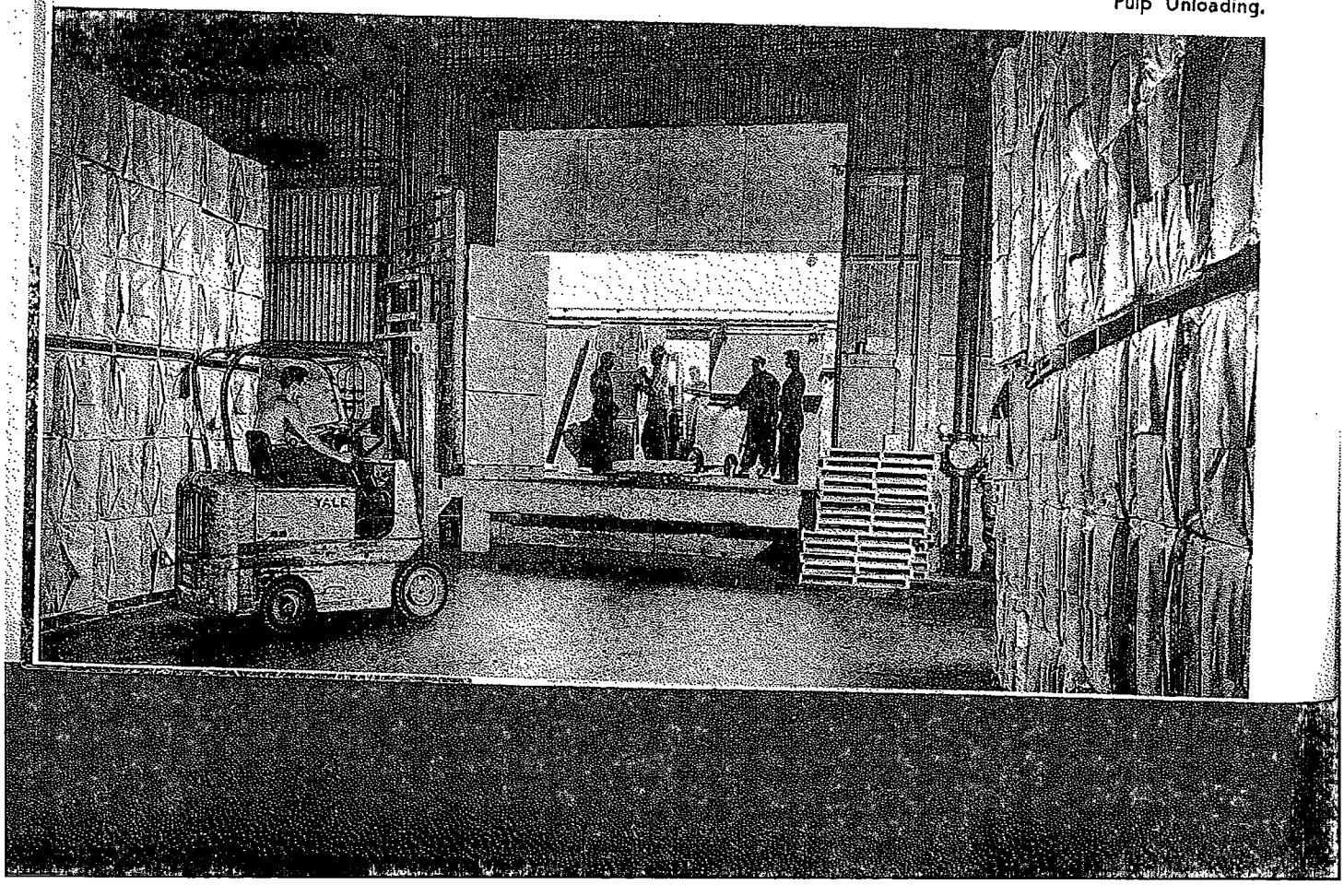
The process requires a great quantity of caustic soda, which is mixed with the pulp and starts the first stage of the series of chemical reactions which lead to our finished product. Under rigidly controlled conditions of time and temperature the resulting product — alkali cellulose — is conveyed into the next stage of the operation, where it is mixed with carbon bisulphide and thoroughly churned until it emerges as a granular yellow substance known as cellulose xanthate.

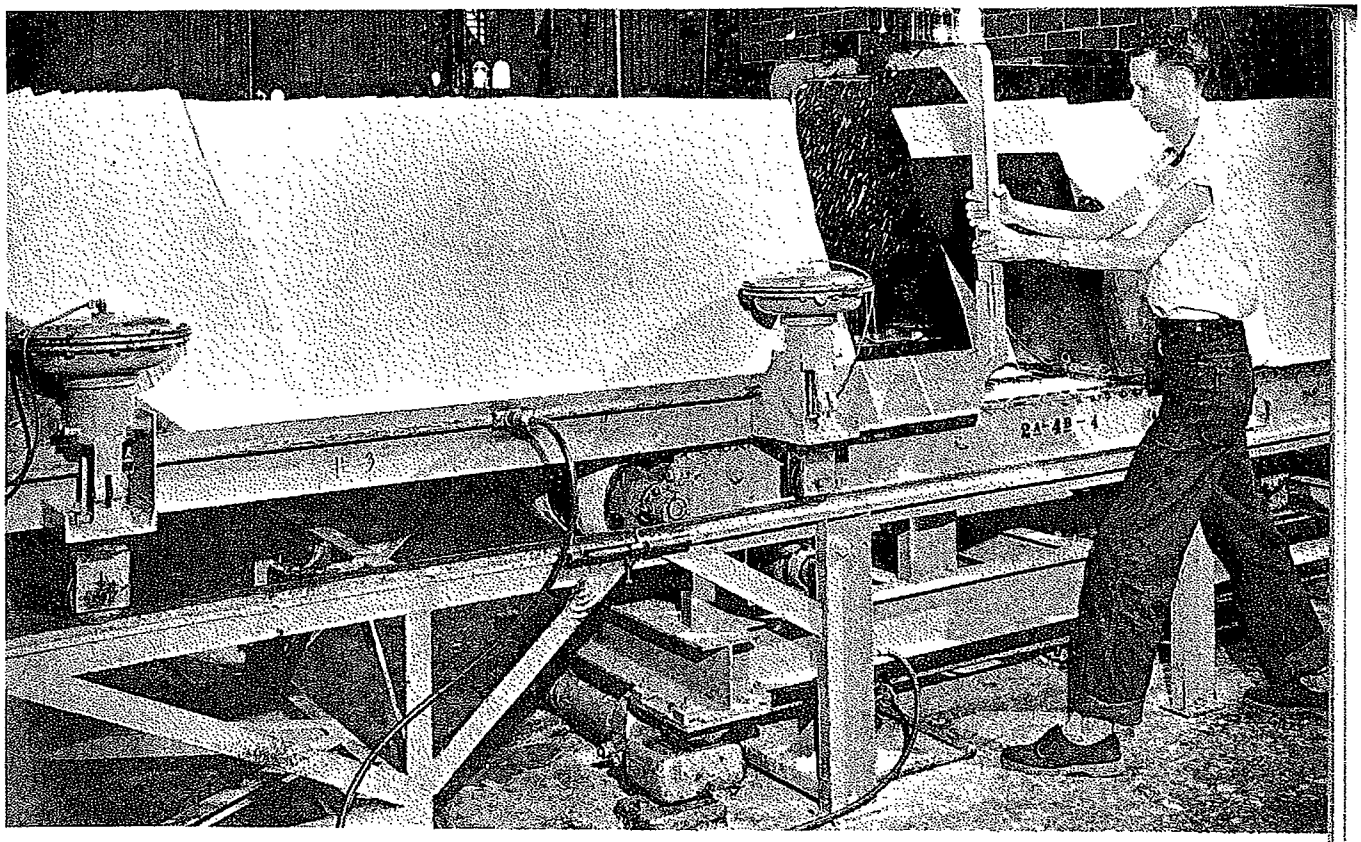
The xanthate is then mixed with dilute caustic soda and stirred for a long period of time until solution is complete, forming a viscous material known as "Viscose", which is, in fact, a uniform solution of cellulose. This mixture is thoroughly purified by pumping it through large filter presses. These presses are located in the Viscose Cave, where very exacting conditions are maintained and the filtering and aging process takes place.

The most amazing step in the entire operation follows. Accurately measured quantities of viscose are pumped through thousands of tiny holes into a solution of sulphuric acid. It appears to the casual observer that magic is being performed, for when the sticky, viscous solution meets the acid, it immediately becomes a solid and a very fine filament of rayon is created before one's very eyes. As there are thousands of holes in each of the metal plates, thousands of filaments emerge at the same time, each independent of its neighbor and each uniform in size.

The newly created filaments are guided into position and drawn together to form a rope-like group of thousands of independent threads. This rope — or "tow", as it is referred to — is then run through an ingenious machine which cuts the filaments into exact pre-determined lengths. This cutter runs at a very high speed and deposits the staple on an endless belt which carries it through the next operation where it is washed clear of all traces of acid and contaminating chemicals. As the heavy blanket of staple fiber emerges from the washing machine, it is delivered on a moving belt into the drier and dried to a controlled moisture. The driers are fired by natural gas, and the temperatures regulated by automatic devices which insure the proper temperature at all stages. They are the first driers of this design to be applied to drying of rayon staple.

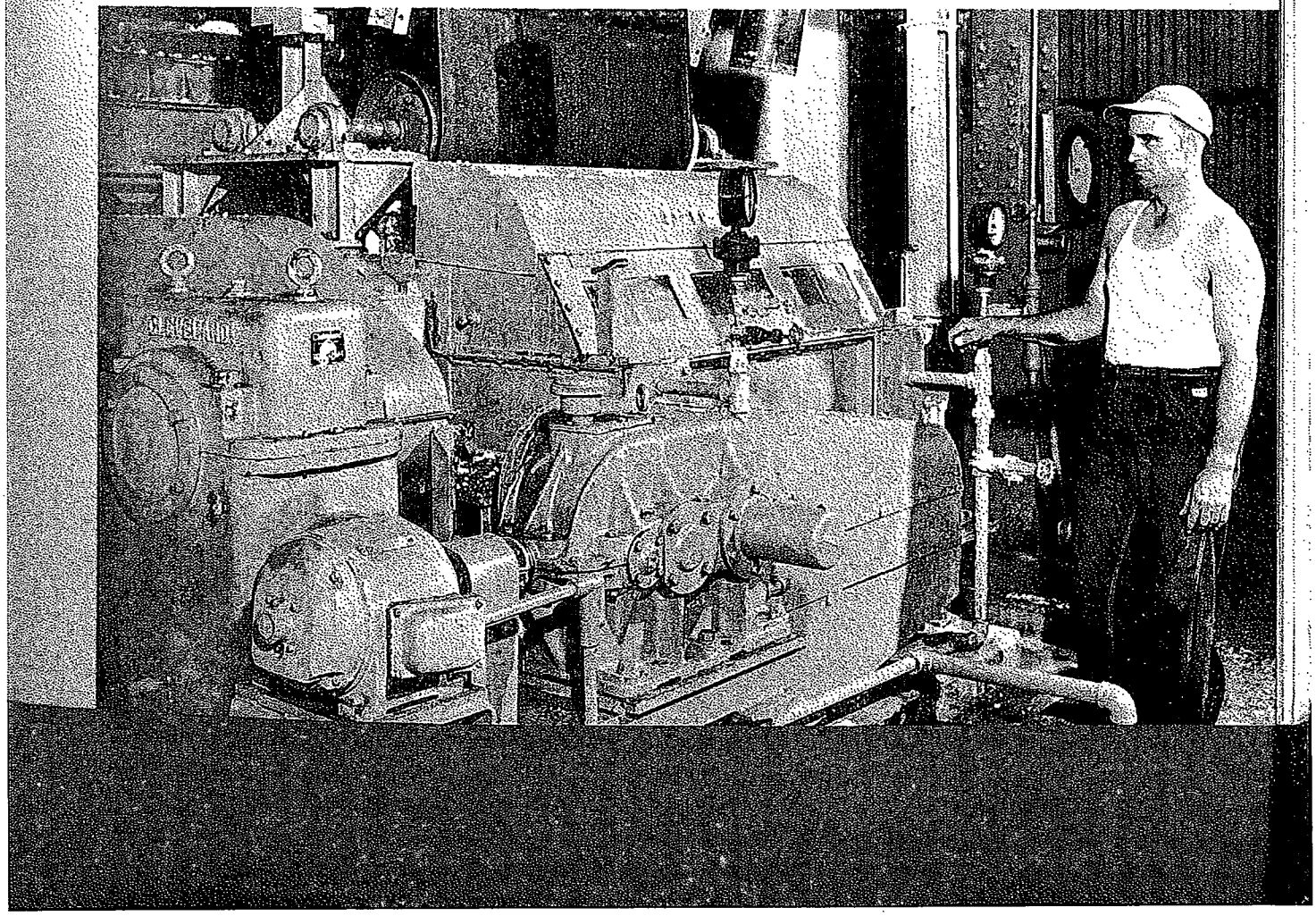
Pulp Unloading.

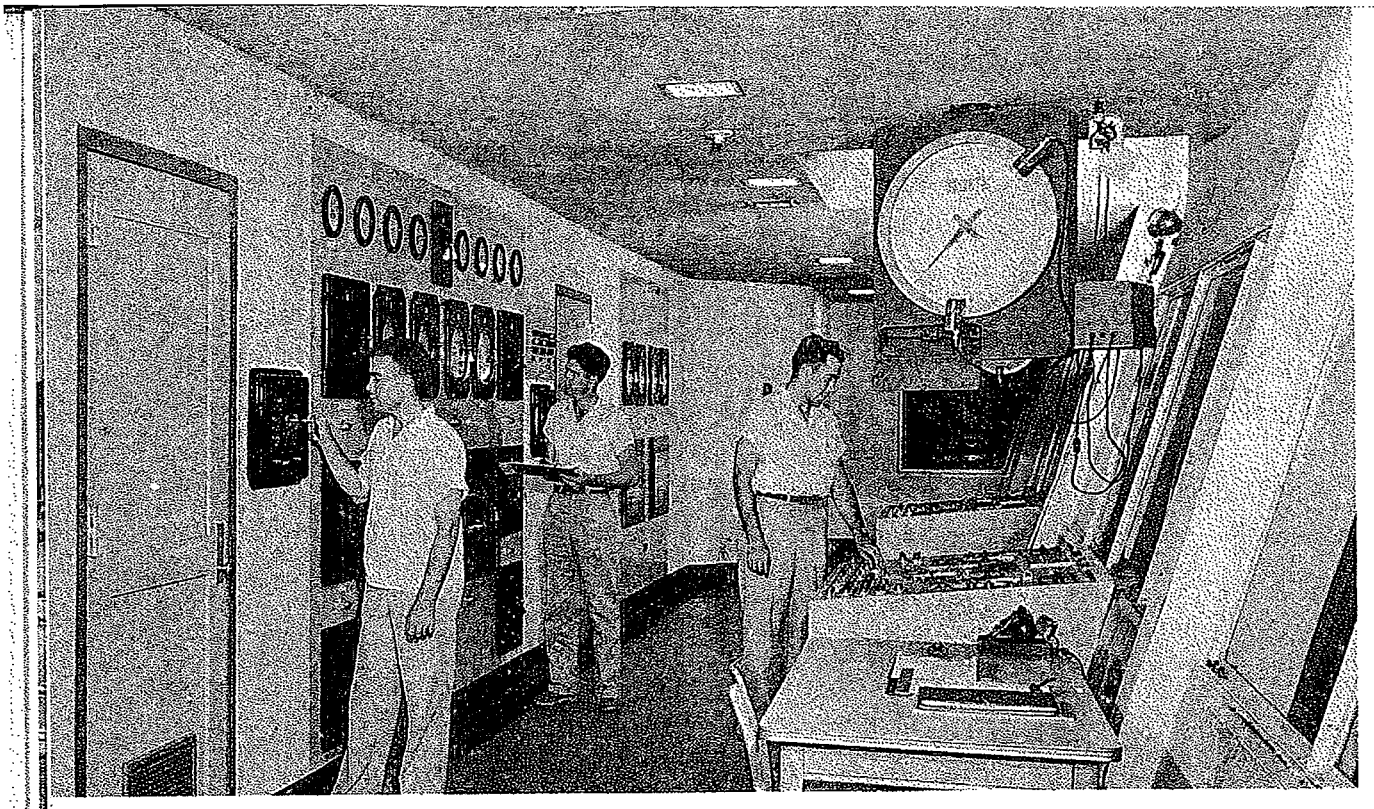




Operator loading sheets of pulp into production line.

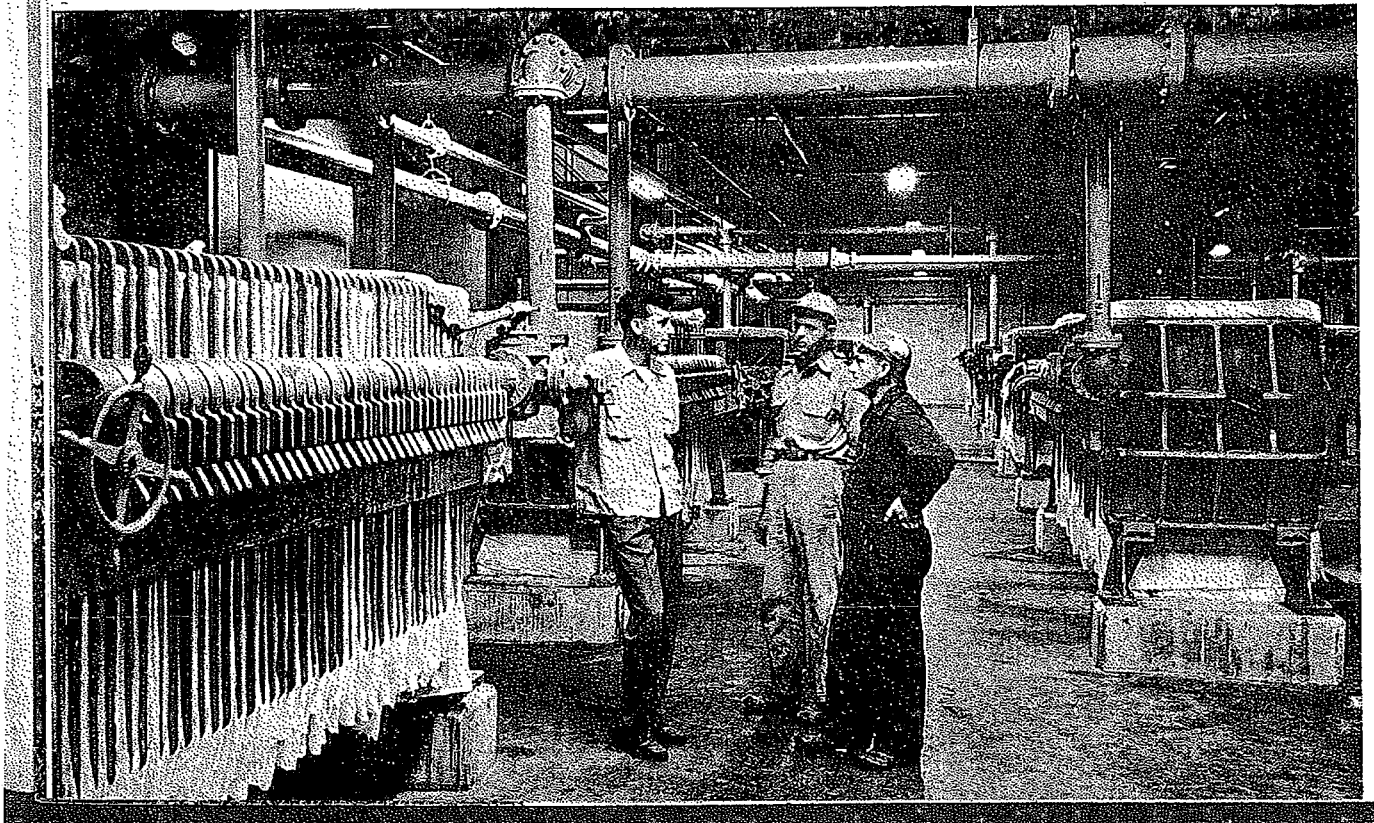
Preparation of alkali-cellulose





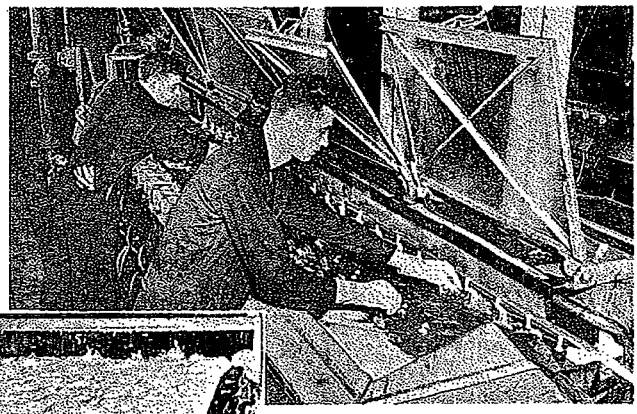
Control Room.

Viscose Filters.

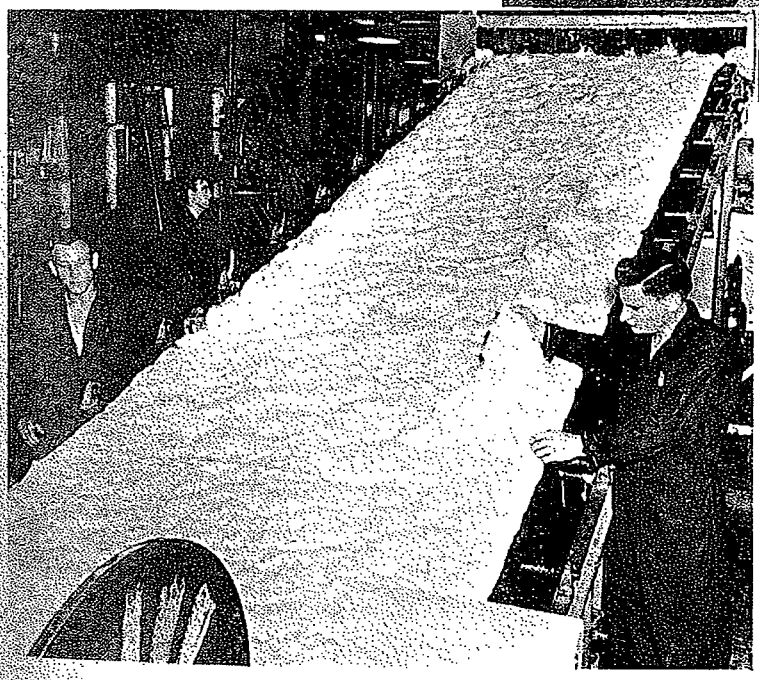


It is only necessary now to run the staple through a high speed opener, where the fibers are separated into the finished light, fluffy product.

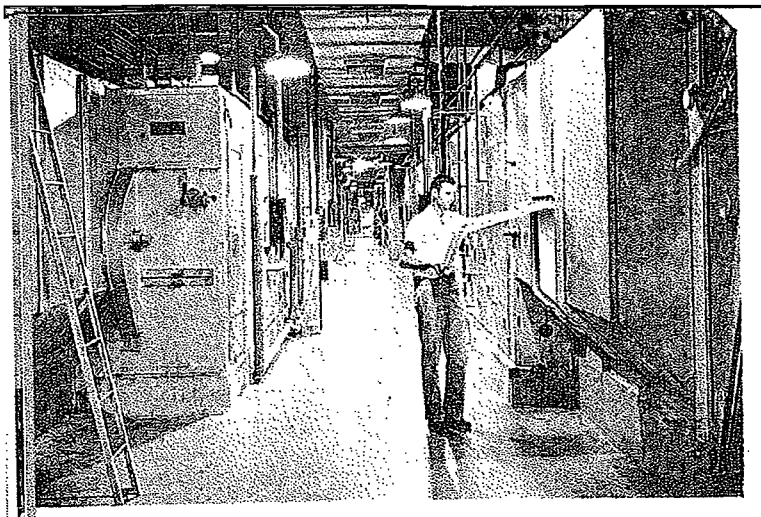
A good product deserves a neat, clean package, so the rayon is conveyed to the large baling presses, where it is packed into sturdy cartons, accurately weighed and properly marked. All bales are carefully identified as to weight and staple length, and after testing are released to be expertly loaded into freight car or truck for shipment to customers.



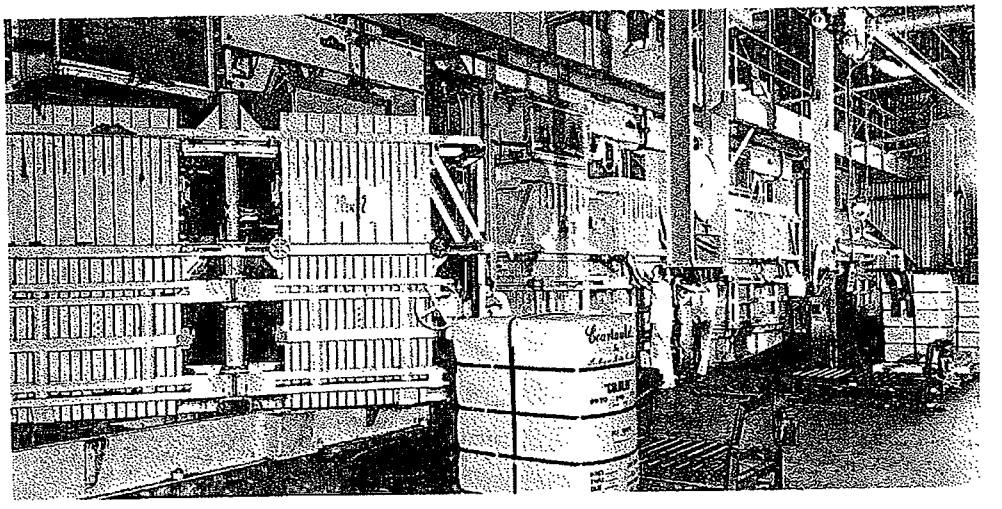
Spinners guiding rayon into position.



Blanket of fiber leaving washing machine.

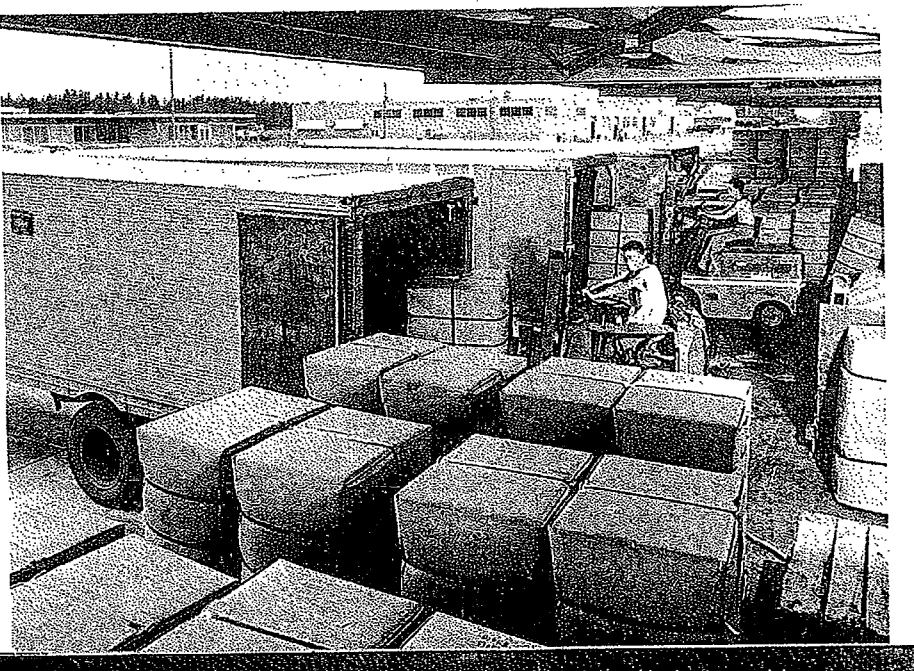


Operator inspecting the drying process.



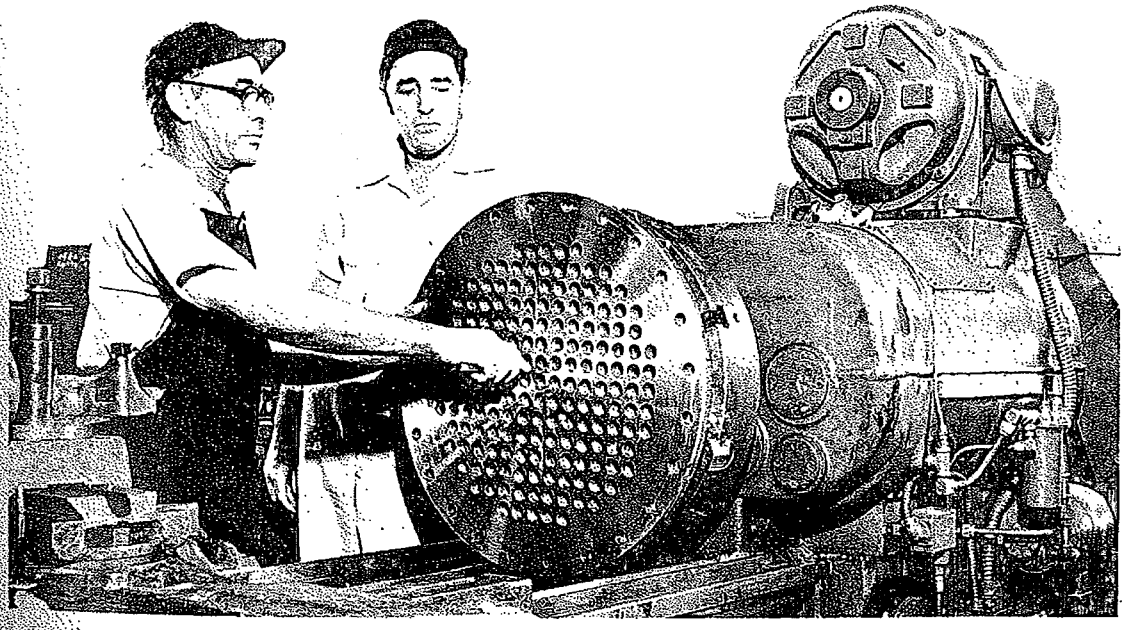
Staple fiber baled for shipment.

On its way to the customer.



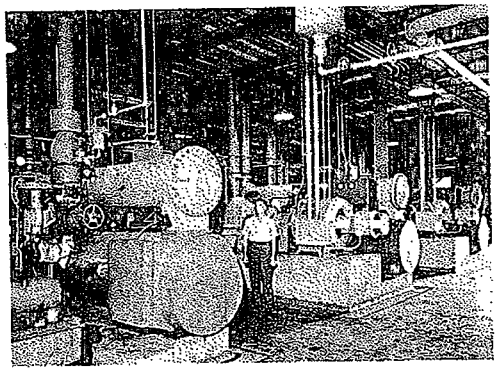
MAINTENANCE AND REPAIR

The operation of such a plant as that of Courtaulds (Alabama) Inc. requires many services in addition to those on the production line. Boiler operators must insure that steam for the factory is always available. Wells which supply millions of gallons of water need constant attention. Water softeners must be inspected and recharged periodically. A vast storeroom of materials and supplies must be maintained at all times. Competent electricians are busily engaged with their maze of wires and complicated electrical machinery. Ingeniously controlled instruments which seem to think for themselves still require the inventive genius of human minds to keep them in operation. Refrigeration service must be provided for large areas of the plant and compressed air must be always available. The maintenance of machinery and equipment is a major factor at Court-

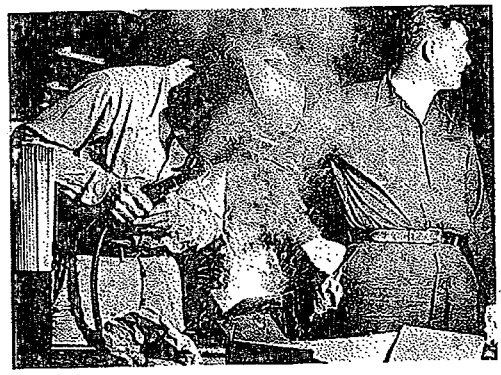


Skilled Courtaulds craftsmen.

aulds, and the most versatile mechanics are required for this purpose. One can readily see that the complications of modern industry require coordination and teamwork of the highest degree, and this is effectively demonstrated by Courtaulds employees, who work side by side servicing, maintaining and operating the machinery which produces our quality product.

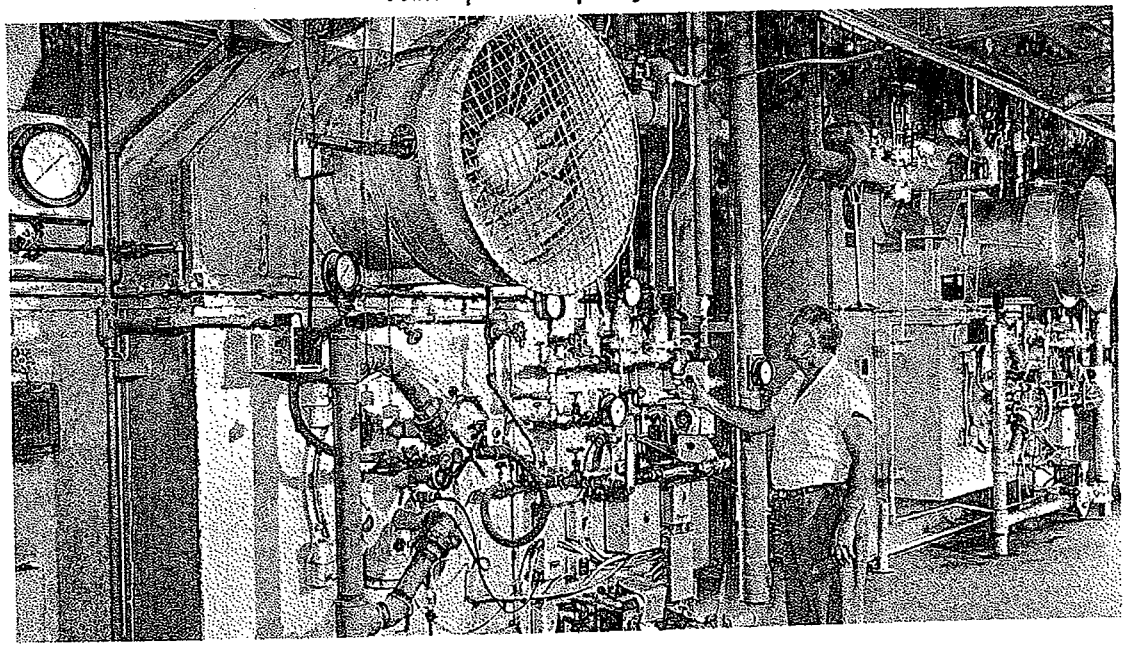


Refrigeration engineer inspecting equipment.



Welder at work.

Boiler operator adjusting controls.

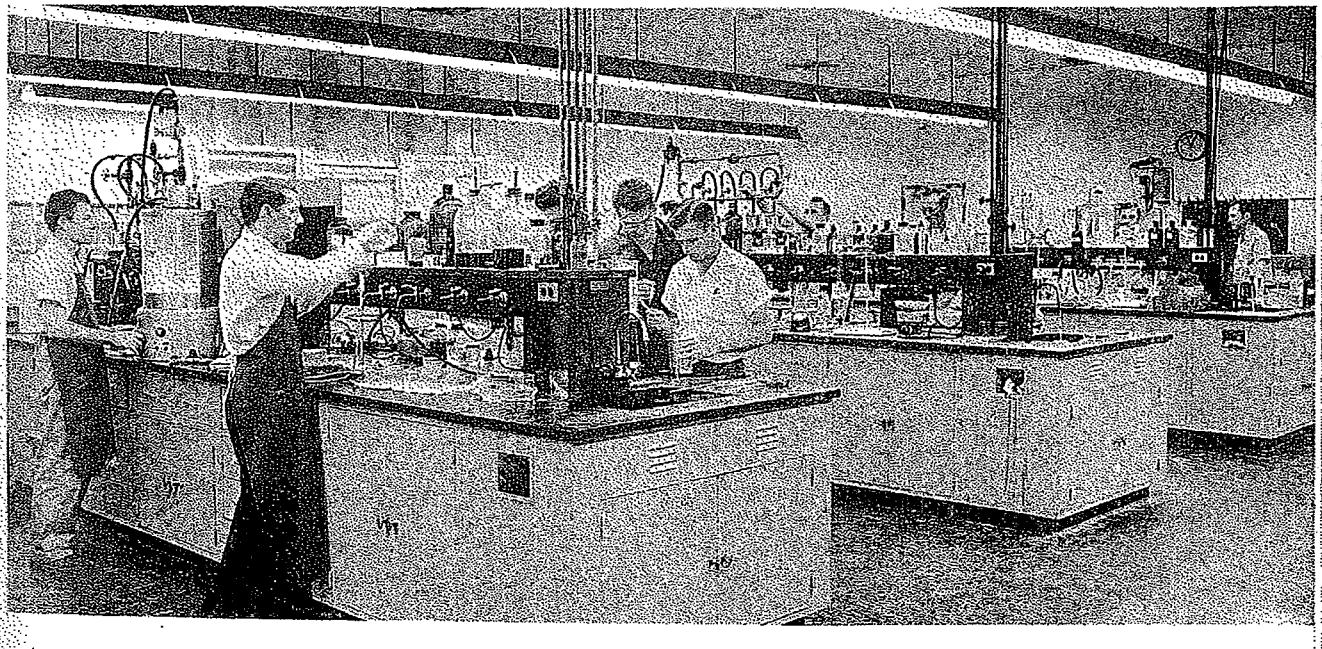


QUALITY CONTROL

Since the manufacture of rayon is chemical in nature, it is only natural that the Company employ the services of many chemists. The laboratories are equipped with the most up-to-date apparatus available, in order that the chemists may have the very best working conditions in which to carry out the numerous controls for which they are responsible. In any laboratory the visitor sees applied science at work, as every phase of the operation is carefully analyzed by skilled scientists.

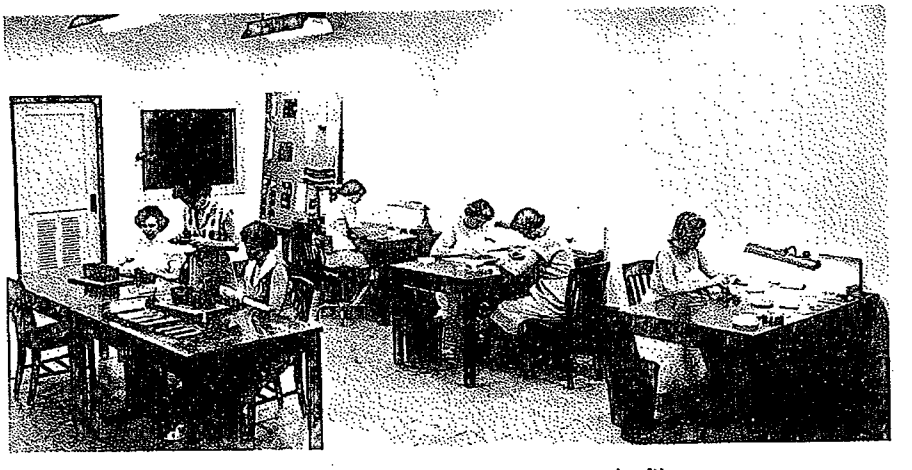
Under the bright lights of the Physical Testing Laboratory, the deft hands of the young ladies are busily engaged in performing the in-

Chemists maintain a careful check on the entire process.

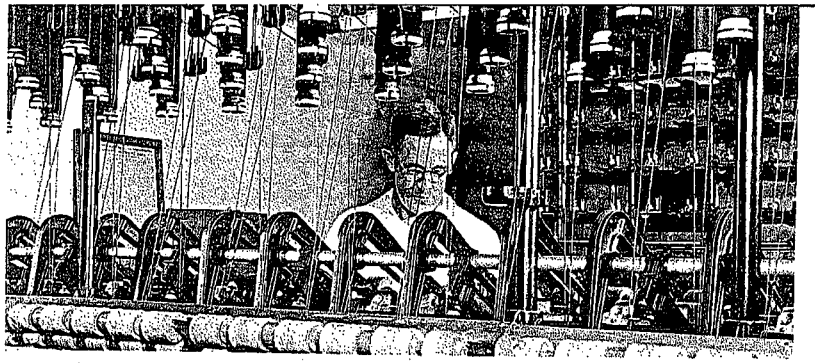


tricate tests required to maintain the high standards necessary in a competitive market. Every bale of rayon staple is sampled and must pass exacting tests as performed by these technicians. Small particles of fiber, which themselves weigh no more than a pencil mark, are physically examined, measured and tested, in order that we might insure the customer getting exactly what he ordered.

The Company's testing does not stop with its final product. To be certain that it meets the highest possible standards of the spinning and weaving mills, skilled technologists card, draw, spin and weave our staple fiber and test it at every stage. The strength and thickness of the yarn is recorded by electronic machinery and other technicians are busily engaged in determining the best combinations of rayon and staple to produce particular results. They also blend the brilliant tones of COLORAY to achieve a rainbow range of hues. Colorfastness and resistance to wear is meticulously measured by our skilled technicians, using the most modern machinery found in the industry. This work is carried on by the Use and Development Department, which is constantly acting as a service for our customers.



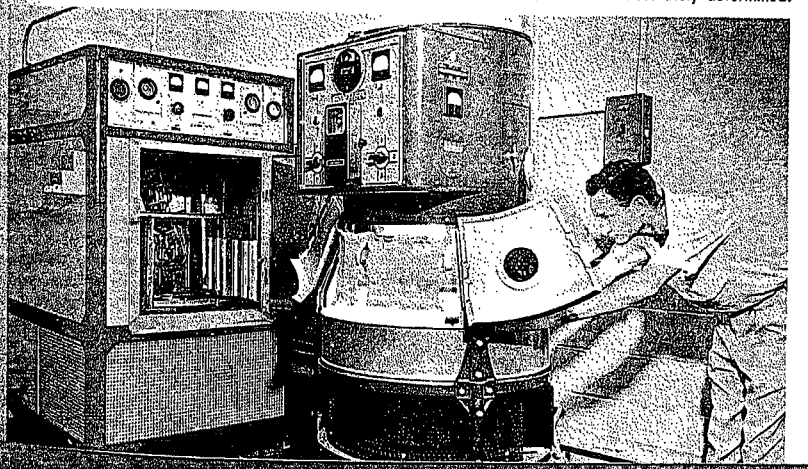
Technicians physically examining staple fiber.



Textile technologist at his spinning frame.

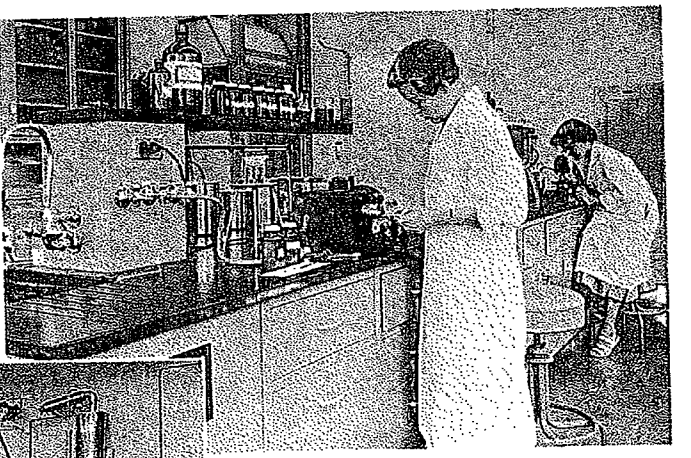
Textile testing laboratory.

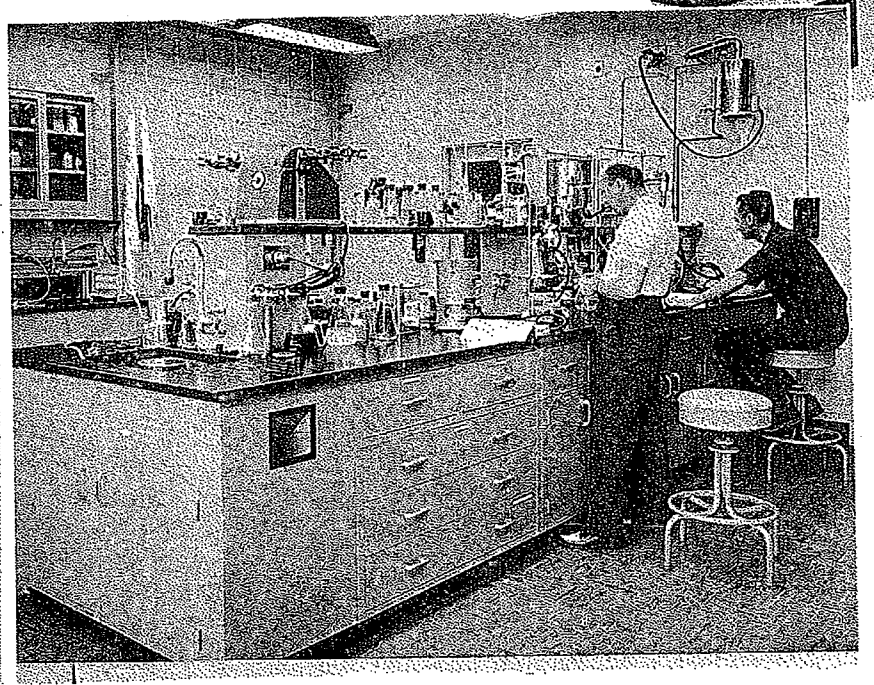
Colorfastness and resistance to wear are accurately determined.



RESEARCH

Progressive industry knows well that it cannot be content with manufacturing a good product today, but must constantly have its eyes on the future. Courtaulds is proud of what it has done in the field of research, and it has now established in conjunction with its new plant an excellent research laboratory and pilot plant. A staff of outstanding research scientists are even now engaged in probing into the mysteries which the chemist's laboratory holds to establish newer and better methods and products for the future.

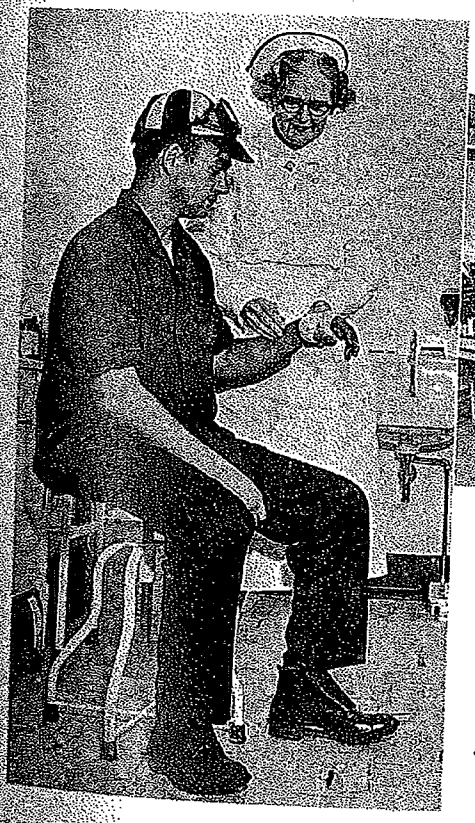




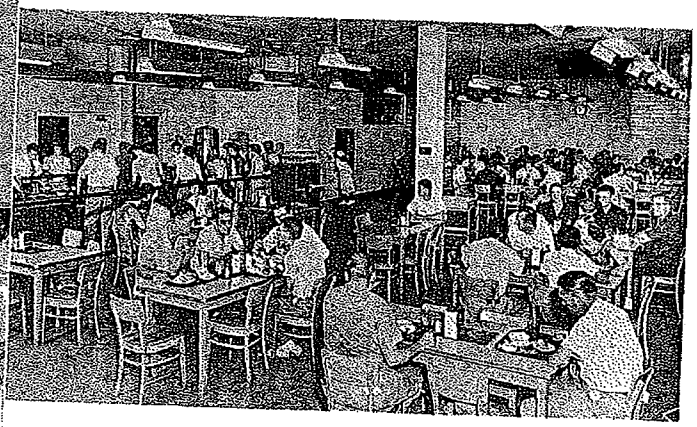
Research scientists at work.

EMPLOYEE SERVICES

Courtaulds believes that its employees, who have agreed to share their work lives with the Company, deserve the very finest in the way of personal services that can be provided by any industry. It has therefore established a modern cafeteria in its plant, where the finest variety of food can be obtained at reasonable cost. A modern First Aid facility, under the care of a registered nurse, has been provided for the treatment of injuries and for safeguarding the health of Courtaulds employees. A staff of industrial physicians is always available, as well as the services of specialists. The Company has assisted in the formation of a Credit Union, whereby systematic saving is encouraged and employees may also borrow money at reasonable interest rates.

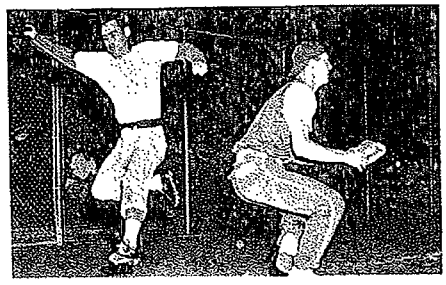


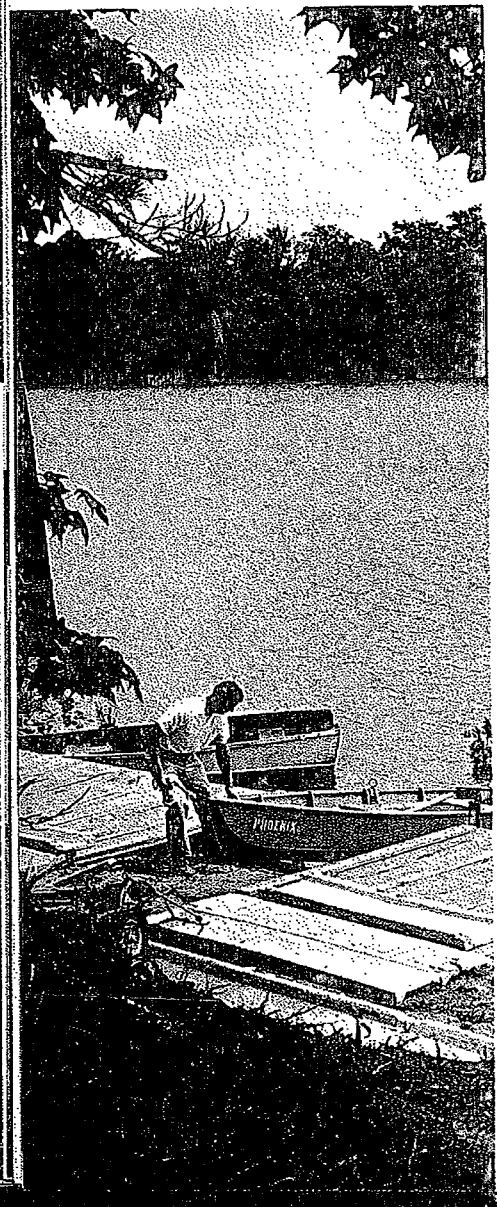
Treatment in the First Aid Room.

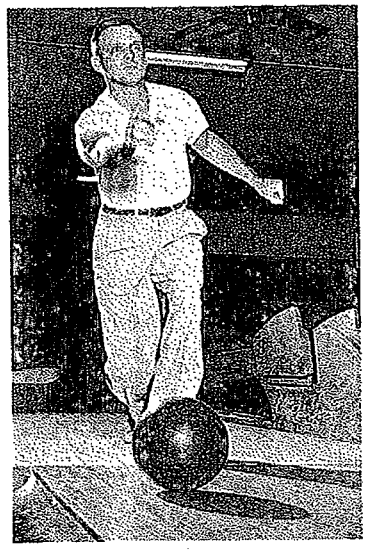


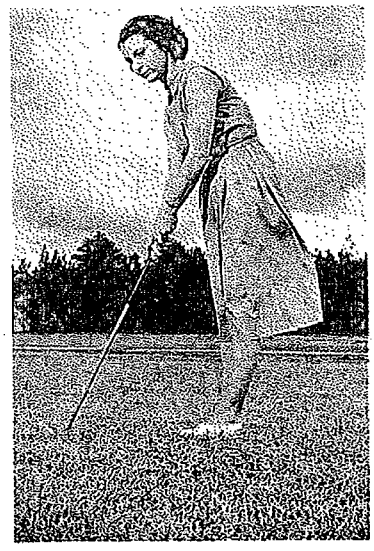
The modern cafeteria.

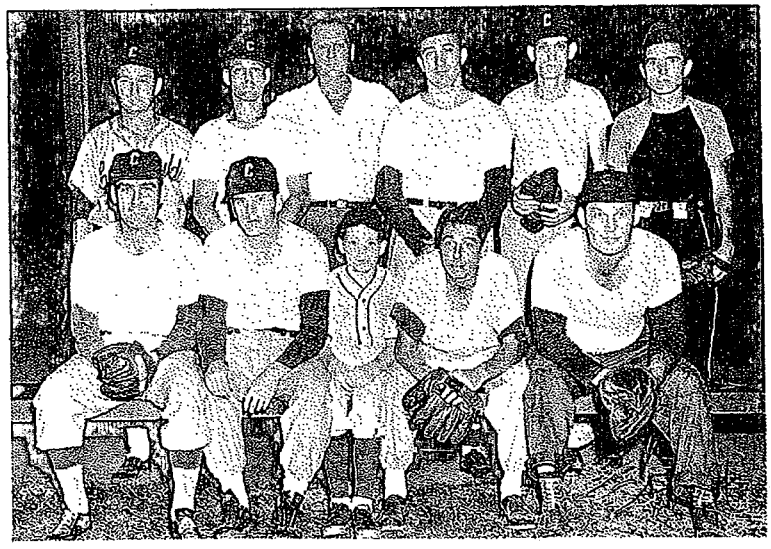
RECREATION





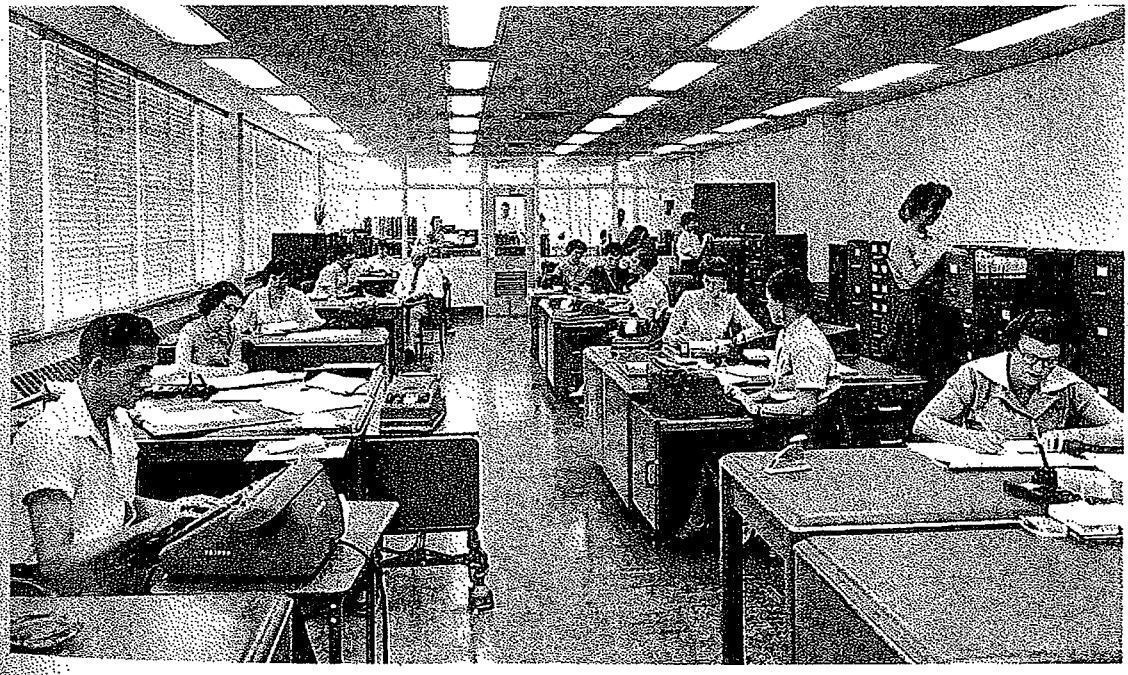




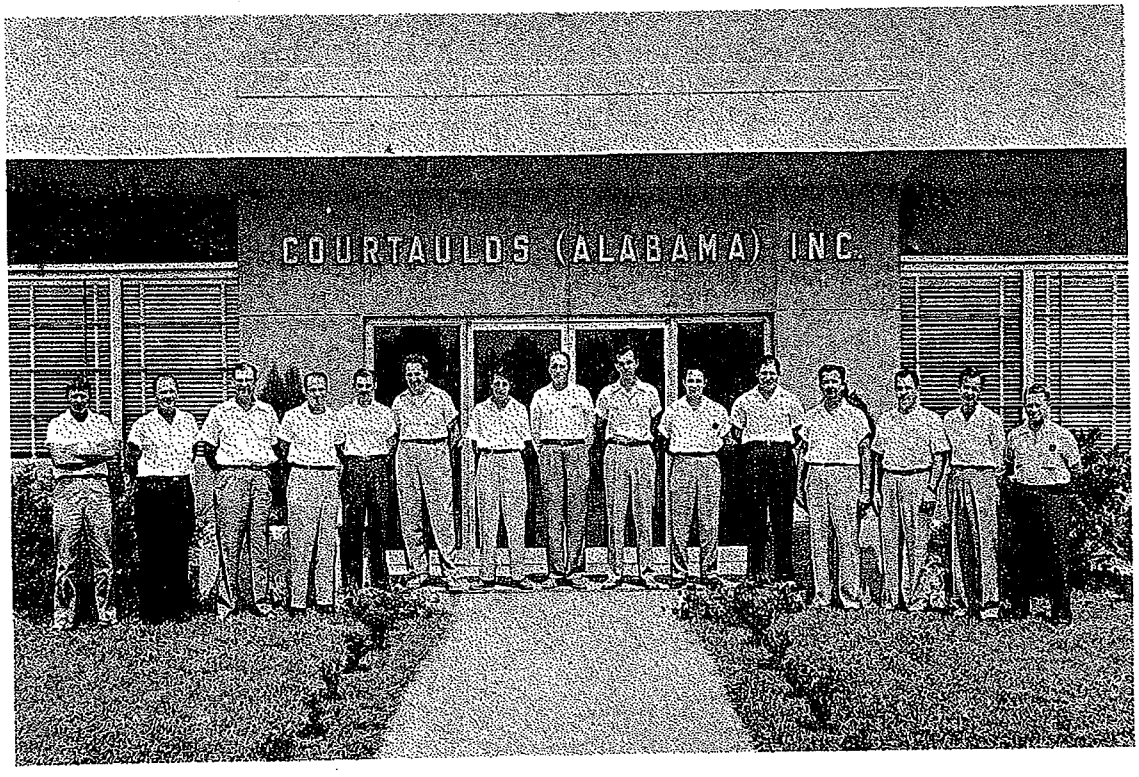


EMPLOYEE BENEFITS

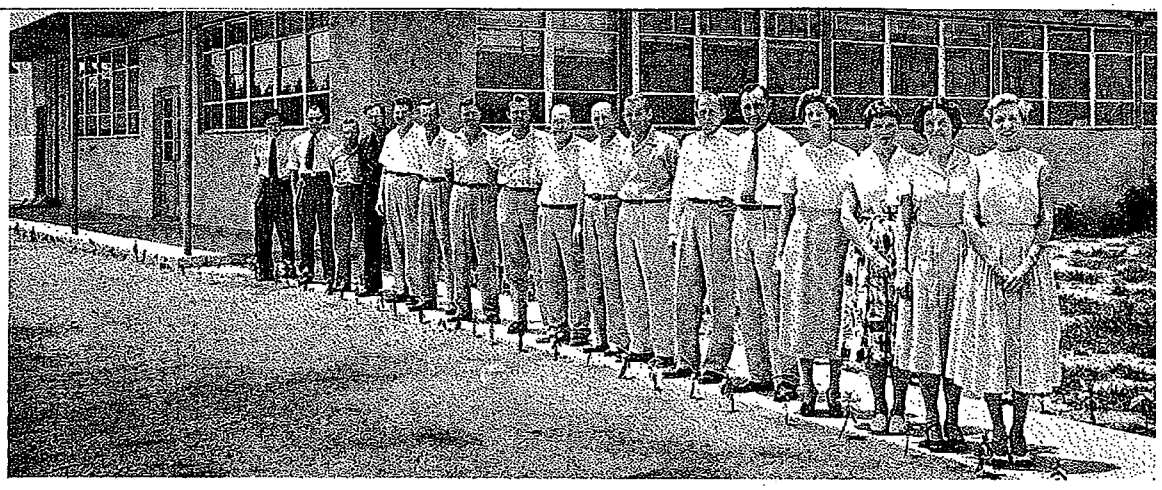
Courtaulds realizes that good management does not stop with materials and machinery, but that it must give its greatest consideration to its men. It believes that in addition to paying good wages, it must assist its employees in providing for emergencies and reward them for long and faithful service. A liberal pension plan, designed by experts, has been established to meet the problem of living after retirement age. The Company also has in effect a comprehensive insurance program which provides hospitalization benefits for all employees, as well as assistance in the payment of medical and surgical fees. Employees physically unable to work are protected against financial distress by sickness and accident insurance, which provides a regular income for many weeks. Life insurance is carried on every man and woman in this plant, under a plan which is the most liberal to be found in the textile industry. All of these benefits are available free of charge to every employee, as the Company willingly bears the entire cost of this extensive insurance and pension program.



General Accounting Office.



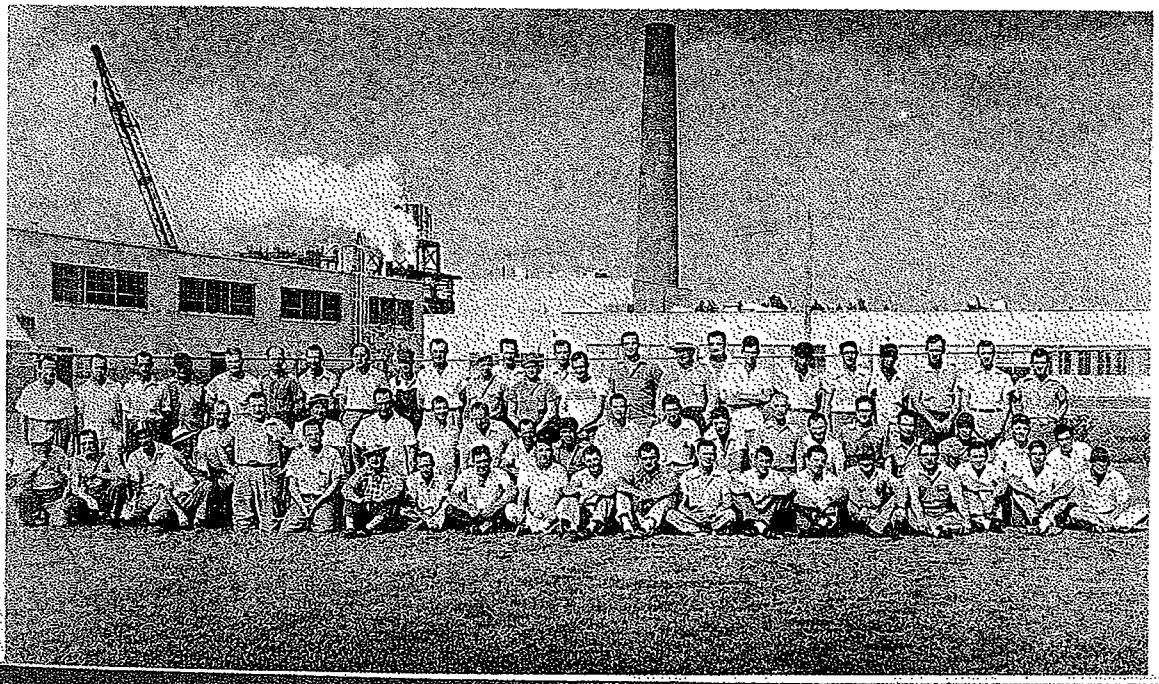
Supervisory personnel.



Research personnel

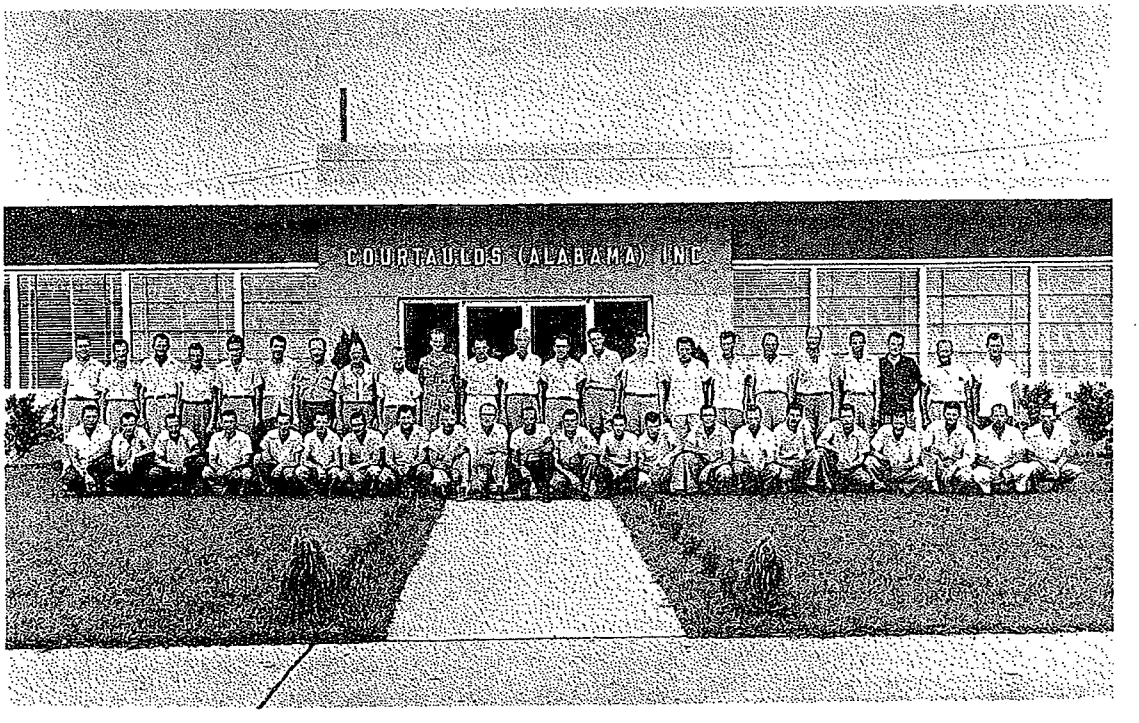
Office staff

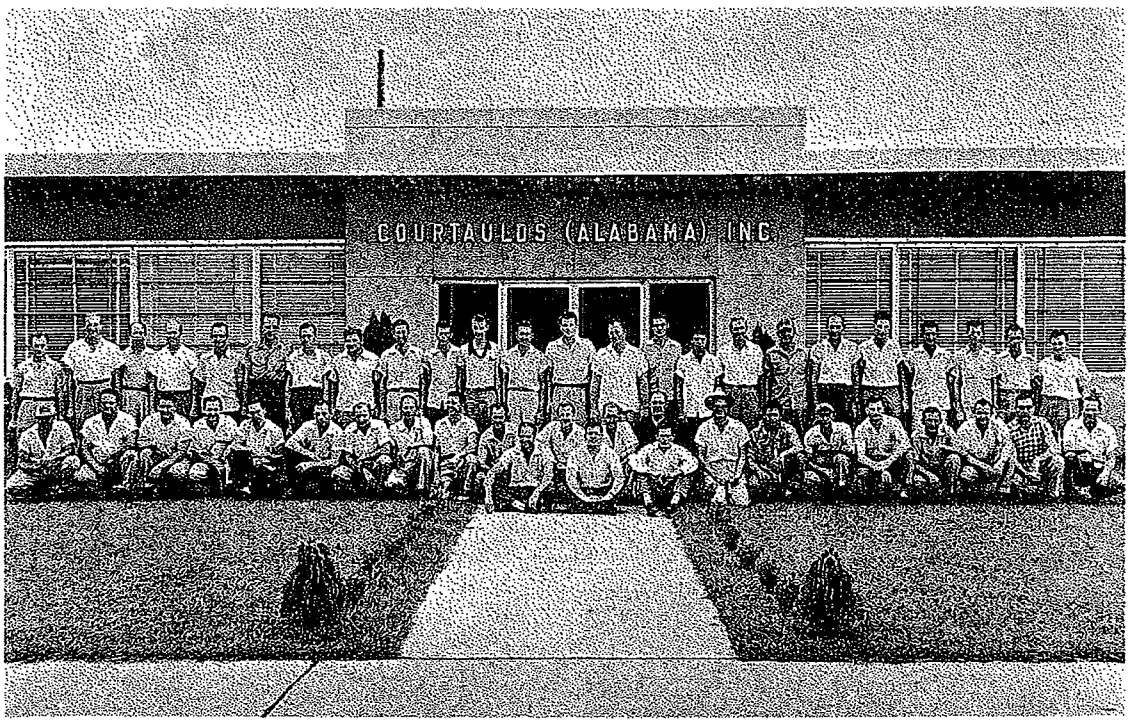
Maintenance Group



"A" Shift

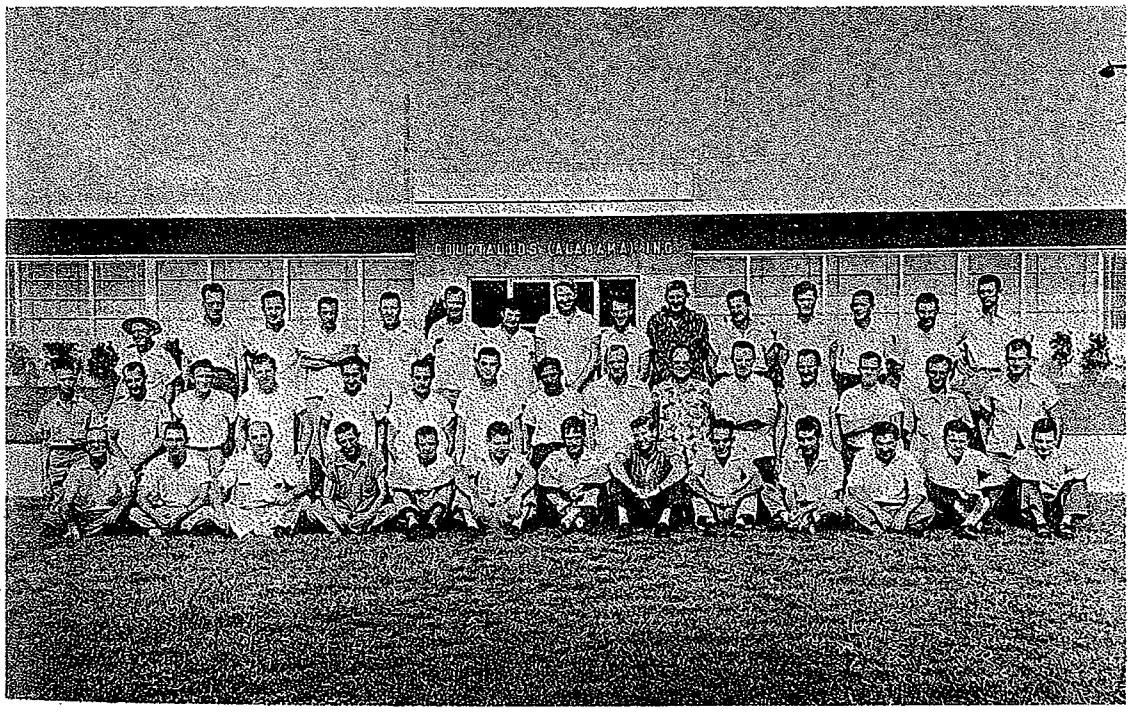
"B" Shift





"C" Shift

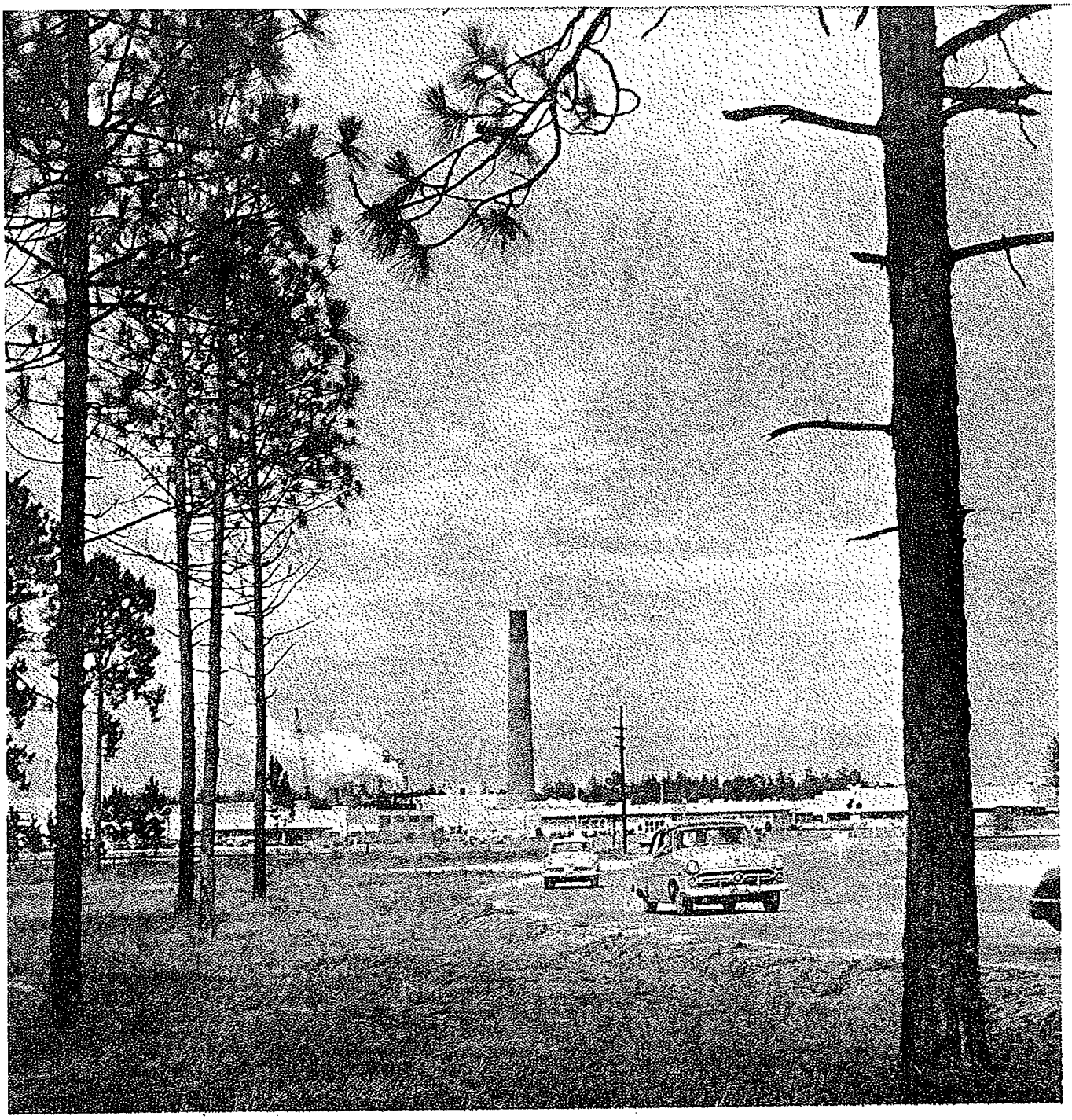
"D" Shift



General Labor Employees.

IN CONCLUSION

The whole story of Courtaulds and its people cannot be told in a booklet such as this. Courtaulds is pleased with its operation at Le-Moyne, but it is particularly proud of the men and women who are making it possible. This is an excellent demonstration that men of good will can work together cooperatively to make a fine product, share in the reward and enjoy security.



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